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Project Change Request Form

Severity: [HIGH]

Project name:

Internationalized Domain Names Expedited Policy Development Process (IDNs-EPDP)

Requested by: Date:

Donna Austin, EPDP Team Chair Justine Chew, EPDP Team Vice Chair Farell Folly, GNSO Council Liaison to the EPDP Team 07 November 2022

Change description:

The IDNs-EPDP Team is requesting approval to make substantive changes to its project plan:

A. Complete the EPDP in two phases:

- Phase 1: covers charter questions and recommendations related to top-level IDN gTLD definition and variant management
- Phase 2: covers charter questions and recommendations related to second-level IDN variant management
- B. A 31-month extension to the original project plan, with projection of the following key milestone dates:
 - Publish Phase 1 Initial Report for Public Comment by April 2023
 - Submit Phase 1 Final Report to the GNSO Council by November 2023
 - Publish Phase 2 Initial Report for Public Comment by April 2025
 - Submit Phase 2 Final Report to the GNSO Council by November 2025
 - Note: since the EPDP Team is not expected to start Phase 2 deliberation before November 2023, the projected milestone dates for Phase 2 have more uncertainty and are subject to change, based on the observation of the team's progress during Phase 2 deliberations.

Change reason:

A. Reasons for Completing the EPDP in Two Phases

1. No Known Interdependency Between Top-Level and Second-Level Charter Questions

The EPDP Charter contains 47 questions – 28 are related to the top-level and 19 are related to the second-level. As top-level labels and second-level labels are distinct from each other in the DNS, the deliberation of top-level related questions does not have known interdependency on deliberation of second-level related questions, and vice versa. In other words, the EPDP recommendations pertaining to the

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second-level should not impact or change the recommendations pertaining to the top-level.

2. Facilitating SubPro Implementation Planning

EPDP Team's recommendations on the top-level have direct impact on the New gTLD Program and are closely linked to the implementation of New gTLD Subsequent Procedures (SubPro) PDP outputs. Finalizing the top-level related recommendations earlier will prioritize the current planning of the SubPro implementation that is focused primarily on the top-level. This approach does not remove the interaction of the second-level work by the EPDP Team with the SubPro implementation. While the majority of the second-level related questions need to be addressed before the next round, their implementation can be performed near the tail end of the implementation cycle.

3. Breaking Workload Into Manageable Chunks

The EPDP Team believes that breaking its work into two phases can help make the recommendations pertaining to the 47 charter questions more digestible. The ICANN community and ICANN Board only need to focus on considering a subset of recommendations each time. This approach is also consistent with the best practices of breaking the PDP work into more manageable chunks, which helps the GNSO Council monitor the progress of the work against milestones.

B. Reasons for Timeline Extension

4. Diversity and Complexity of IDN Issues

The IDNs-EPDP charter includes diverse and complicated issues related to IDN variant implementation, including the utilization of RZ-LGR, impact of variants on the New gTLD program, and post delegation issues concerning the top- and second-level IDNs. When the original project plan was submitted to the GNSO Council in September 2021, it was not foreseen by the EPDP Team that intensive preparation and study were required to understand each topic and charter question. For example, consideration of the impact of variants on the String Similarity Review required 13 weeks of deliberations by a dedicated small group as well as additional discussion by the full EPDP Team. These efforts were essential but extended the time needed to complete deliberations on the charter questions. Learning from this experience, the updated project plan includes extended duration for deliberating on the remaining charter questions that have not been addressed.

5. Additional Data Collection Needs

The EPDP team's deliberation on charter questions related to second-level IDN variant management depends on the collection and analysis of additional data, which may be provided by registries, registrars, and possibly Registry Service Providers (RSPs). The EPDP Team is in the process of exploring appropriate venues and approaches to collect the data, including consultation with the Contracted Parties House's TechOps group. Additional time is required for this data collection effort, which is on the critical path for deliberating charter questions to be covered in Phase 2. However, this data gathering effort can take place concurrently with the Phase 1 work and should complete before the start of Phase 2 work.

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6. ICANN Org Input for Draft Recommendations

Similar to the practices in other (E)PDPs, ICANN org provides input, particularly from an implementation perspective, to the draft recommendations developed by the IDNs EPDP Team before the publication of the Initial Report. Additional time needs to be budgeted to ensure that the EPDP Team is able to front load the review of ICANN org input and publish the draft recommendations for public comment that already take the operational considerations into account.

7. Public Comment Review and Final Report Completion

Since the EPDP Team plans to complete its work in two phases, the review of public comments for both phases of Initial Report will require dedicated time and effort. The finalization of recommendations from both phases of Final Report will also require significant time; additional topics may arise as a result of the public comments. It is expected that the EPDP Team has to conduct the two phases of work sequentially, not in parallel.

Impact of change (complete for relevant categories):

- Scope: The scope of the IDNs-EPDP has not changed. Nevertheless, the charter includes catch-all
 questions to potentially include additional issues that the EPDP Team identifies throughout its
 deliberations. The EPDP Team has already identified some additional issues and may identify more.
 The EPDP Team may develop additional recommendations pertaining to those issues.
- Budget: N/A
- **Timeline**: There will be an additional 31-month extension to the overall project completion from the original project plan. While the requested extension seems long, the remaining workload is significant.
- Resourcing: Additional community volunteer time is needed, as well as commitment from staff and liaisons. Since the IDN subject expertise is concentrated on a limited number of individuals, their continued dedication will be required for supporting this extended period of work.
- **Communications**: The Project Change Request was communicated to the GNSO Council on 07 November 2022.
- Other: The GNSO Council may consider the impact on potential new work to be launched in 2023-2025. The ICANN community and ICANN org may consider the impact on SubPro implementation, particularly its IDN track.

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Proposed action:

The EPDP Team will:

- Submit to the GNSO Council the updated project plan that reflects the projected key milestone dates.
- Commit to work together in increasing the efficiency in its deliberations.
- Develop an efficient process for reviewing ICANN org input, producing Initial Reports, reviewing public comments received, and finalizing recommendations for Final Reports.
- Invite the GNSO Council to provide suggestions and guidance to ensure that the EPDP Team adheres to its updated project plan and new target delivery date.

Estimated Associated cost, if applicable:

Direct cost impact cannot be calculated at this time. However, this extension will likely impact community and staff resources.

Outcome of the request (to be completed AFTER the GNSO Council completes its deliberation on the request):