

Rec # & Link	Comments Received?	Significant Concerns or Objections Raised?	Further Consideration Required	Public Comment Statistics		
<b>Section 4.1 RZ-LGR as the Sole Source</b>				<b>No. Submission</b>	6	
<a href="#">Rec 1.1</a>	No	No	No	<b>No. Commenters</b>	6	Note: No duplicate submissions from 1 party/commenter
<b>Section 4.2 Same Entity Principle</b>				<b>Commenters</b>	Davies Lewis	General Comments (Not tied to a Rec): Summary below
<a href="#">Rec 2.1</a>	No	No	No		ALAC	Supports steps taken by WG on Recs 3.3, 3.4, 3.5, 3.7, 3.10, 3.11, 3.12, 3.13, 3.14, 3.15, 3.22, and 3.25) and IG (3.6, 3.8, 3.9). General comments (Non-actionable) in the summary below
<b>Section 4.3 Application Submission, Administrative Check, Initial Evaluation</b>					Timileyin Adisa	General Comments (Not tied to a Rec): Summary below
<a href="#">Rec 3.1</a>	No	No	No		RrSG (Zoe Bonython)	General Comments (Not tied to a Rec nor actionable): Summary below
<a href="#">Rec 3.2</a>	No	No	No		BC	Objections to 2 recommendations (Recs 3.11, 3.14.1). General comments in the summary below
<a href="#">Rec 3.3</a>	Yes	No	No	RySG (Elizabeth Bacon)	General Comments (Not tied to a Rec): Summary below	
<a href="#">Rec 3.4</a>	Yes	No	No	<b>No. Recs that received comments</b>	15 out of 69	
<a href="#">Rec 3.25</a>	Yes	No	No	<b>No. Recs that received significant concerns or objections</b>	2 out of 69	BC objections related to the "Conservatism" principle (Recs 3.11, 3.14.1). Note: Some commenters did not explicitly indicate the level of support or non-support to a specific recommendation; staff placed such comments under general comments and/or relevant recommendations for the ICANN Board to consider.
<a href="#">Rec 3.5</a>	Yes	No	No			
<a href="#">IG 3.6</a>	Yes	No	No	<b>Other Relevant Development</b>		
<a href="#">Rec 3.7</a>	Yes	No	No	N/A		
<a href="#">IG 3.8</a>	Yes	No	No			
<a href="#">IG 3.9</a>	Yes	No	No	<b>General Comments</b>		
<a href="#">Rec 3.10</a>	Yes	No	No	Davies Lewis	Not tied to a Rec	Summary: General Comment on the need for demand analysis to facilitate the use of labels in IDNs
<a href="#">Rec 3.11</a>	Yes	Yes	Yes	ALAC	Non-actionable	Summary: Strong support for and comments related to topics such as mitigating risk of end-user confusion and harm, Strings in scripts not yet integrated into the RZ-LGR
<a href="#">Rec 3.12</a>	Yes	No	No	Timileyin Adisa	Not tied to a Rec	Summary: Registry Operator Responsibilities, Compliance Checks, Audit Mechanisms, Transparency and Reporting, Community Engagement and Dispute Resolution Mechanisms are some of the many mechanisms through which the integrity of the relationship between primary labels and their allocable and blocked variants can be safeguarded, promoting stability and reliability within the domain name system.
<a href="#">Rec 3.13</a>	Yes	No	No	RrSG (Zoe Bonython)	Not tied to a Rec nor actionable	Summary: Supports the EPDP-IDNs P1 Final Report recommendations and has no additional feedback.
<a href="#">Rec 3.14</a>	Yes	Yes	Yes	BC	Objections to recommendations - Need consideration	Summary: BC would support the ICANN Board to encourage the continuous and healthy development of IDN in both gTLDs and ccTLDs. BC acknowledges the current use of IDN TLDs may be still limited, and the user experiences vary from TLD to TLD. On the issue of variant at the top-level, some IDN ccTLD allows variant / synchronized TLD, and some chose not to request a variant string. For IDN gTLD applicants in the 2012 round, some submitted corresponding variant strings to ICANN and some were not. BC believes that a future IDN TLD applicant should continue to have such a choice of not applying variant TLD.
<a href="#">Rec 3.15</a>	Yes	No	No	RySG (Elizabeth Bacon)	Not tied to a Rec	The RySG thanks the team for its consideration of previous input by the RySG. The RySG notes that in developing recommendations, the EPDP WG should be mindful of maintaining a balance between creating rules for IDNs that promote security and stability, but are not so onerous that they create an undue burden for Registry Operators to operationalize IDNs and offer them to customers. RySG supports the ability to offer IDNs to enable domain name registrants to register and use domain names in the languages and scripts they use, but at the point where IDNs become too difficult to implement, that hampers the ability of Registry Operators to offer that service to those users.
<a href="#">Rec 3.16</a>	No	No	No			
<a href="#">Rec 3.17</a>	No	No	No			
<a href="#">Rec 3.18</a>	No	No	No			
<a href="#">Rec 3.19</a>	No	No	No			
<a href="#">Rec 3.20</a>	No	No	No			



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<a href="#">IG 9.2</a>	No	No	No			
<a href="#">Rec 9.3</a>	No	No	No			
<a href="#">IG 9.4</a>	No	No	No			
<b>Section 4.10 Charter Questions with No Recommendations</b>						
<a href="#">Other</a>	No	No	No			

#	Contributor	Comment		
1	Davies Lewis	To facilitate the use of labels in IDN, the demand must be analyzed, whether such a label should really be created and check possible visual or sound confusion, which can lead organizations and individuals to errors and be more prone to fraud and data theft.		
2	ALAC	<p><b>Mitigating risk of end-user confusion and harm:</b> The ALAC strongly supports the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD. The WG should be congratulated for taking into account the individual end-user perspective in balancing the potential risk of user confusion and potential for harm through exploitation of such user confusion, against the utility of a language's unconditional need for, and use of variant TLDs to facilitate a better end-user experience.</p> <p><b>Strings in scripts not yet integrated into the RZ-LGR:</b> The ALAC is of the view that the IDNs-EPDP Recommendation 3.22 (which in effect discourages applications for strings in scripts not yet integrated into the RZ-LGR) would be the more sensible way to proceed than the Subsequent Procedure PDP Final Report Implementation Guidance 25.3 (potential contradiction between the two), in respect of scripts not (or not yet) integrated into the RZ-LGR.</p>		
3	Timileyin Adisa	<p>To ensure the integrity of the relationship between primary labels and their allocable and blocked variants, I will like to recommend these mechanisms can be implemented:</p> <ul style="list-style-type: none"> <li>- <b>Registry Operator Responsibilities:</b> Registry operators should be tasked with the responsibility of maintaining the integrity of the relationship between primary labels and their variants. They should implement robust processes and controls to manage variant labels accurately.</li> <li>- <b>Compliance Checks:</b> Regular compliance checks can be conducted by ICANN or designated authorities to verify that registry operators are adhering to the rules and guidelines regarding variant label management. These checks should ensure that variant labels are correctly associated with their respective primary labels.</li> <li>- <b>Audit Mechanisms:</b> Periodic audits of registry operators' systems and processes can be carried out to assess their compliance with the rules governing variant label management. Audits can verify the accuracy of variant label allocations and identify any discrepancies or irregularities.</li> <li>- <b>Transparency and Reporting:</b> Registry operators should maintain transparency regarding their variant label management practices. They should provide regular reports detailing the allocation and status of variant labels associated with primary labels. This transparency allows for greater accountability and oversight.</li> <li>- <b>Community Engagement:</b> Engaging the domain name community in the oversight of variant label management can help ensure integrity. Establishing mechanisms for community input and feedback can provide additional scrutiny and validation of registry operators' actions.</li> <li>- <b>Dispute Resolution Mechanisms:</b> Clear and effective dispute resolution mechanisms should be in place to address any conflicts or disagreements related to variant label management. These mechanisms should provide a fair and impartial process for resolving disputes between stakeholders.</li> </ul>		

4	RrSG	<p>This is a significant undertaking by ICANN org and the ICANN community, and the RrSG appreciates the dedication of the team in reviewing this matter.</p> <p>The RrSG supports the recommendations in the EPDP-IDNs P1 Final Report, and does not have any additional feedback. The RrSG is actively participating in this EPDP, and looks forward to the Phase 2 report which will focus more on issues that will directly impact registrars and domain name registrants.</p>		
5	BC	<p>BC supports the ICANN Board to encourage the continuous and healthy development of IDN in both gTLDs and ccTLDs. BC acknowledges the current use of IDN TLDs may be still limited, and the user experiences vary from TLD to TLD. On the issue of variant at the top-level, some IDN ccTLD allows variant / synchronized TLD, and some chose not to request a variant string.</p> <p>BC continues to have strong concerns about the implementation of the "Conservatism" principle, and believes that the EPDP team made the recommendations contrary to such principle. Specifically, the "Same entity" rule should apply to not only at the top-level, but also across all levels (IDN.IDN). Without such policy and implementation in places, domain names used as a business (and visited by the customers) would likely to reduce or even lose its credibility and confidence to the public. <b>BC strongly recommends to the Board that until such policy is agreed and implemented across all IDN gTLDs, no IDN.IDN variant should be allowed.</b></p> <p>On the issue of single character Han (Chinese Japanese Korean) script in the subsequent round, BC holds its neutral position but strongly urges the Board to call for a cross-community consultation on this issue prior to making any decision. Proper policy consultation with the ccNSO and the GAC is essential as hundreds of single-character Han scripts are used as abbreviations of country, territory, and geographic names in daily life. BC believes that an immediate examination of the Draft language of Geographic Names in the new AGB should take place.</p> <p>BC would like to respectfully remind the Board that voting on the above issues require strict COI declaration. Board members, who have ownership and stakes in any IDN gTLD related businesses, should be requested not to participate in the voting processes.</p>		
6	RySG	<p>The RySG thanks the team for its consideration of previous input by the RySG.</p> <p>The RySG notes that in developing recommendations, the EPDP WG should be mindful of maintaining a balance between creating rules for IDNs that promote security and stability, but are not so onerous that they create an undue burden for Registry Operators to operationalize IDNs and offer them to customers. RySG supports the ability to offer IDNs to enable domain name registrants to register and use domain names in the languages and scripts they use, but at the point where IDNs become too difficult to implement, that hampers the ability of Registry Operators to offer that service to those users.</p> <p>The RySG thanks the IDN EPDP for its continued dedication to the work of the EPDP and for lending their expertise to this important topic.</p>		

**Charter Question A1:** For existing delegated gTLD labels, does the WG recommend using the RZ-LGR as the sole source to calculate the variant labels and disposition values?

**Final Recommendation 1.1:** The RZ-LGR must be the sole source to calculate the variant labels and disposition values for all existing delegated gTLDs.

*\*Wording change from Preliminary Recommendation after public comment: add "existing" and remove "2012 round" as RZ-LGR is applicable to all gTLDs.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B1:** Both the SubPro PDP and the Staff Paper recommend that variant TLDs that ICANN delegates must have the “same entity” as the sponsoring organization and the “Registry Operator” be used as the definition of the “same entity” at the top-level. Should this recommendation be extended to existing TLDs?

**Final Recommendation 2.1:** Any allocatable variant label of an existing gTLD, as calculated by the RZ-LGR, can only be allocated to the same registry operator or withheld for possible allocation only to that registry operator.

*\*Wording change from Preliminary Recommendation 2.1 after Public Comment: Removed the mention of “IDN” in order to future-proof potential updates to the RZ-LGR, in the event that allocatable variant labels are created from ASCII code points.*

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B4:** What should an application process look like in terms of timing and sequence for an existing and future Registry Operator with respect to applying or activating their allocatable variant TLD labels?

**Final Recommendation 3.1:** An application for an allocatable variant label cannot precede an application for that variant label's primary gTLD string.

*\*Removed "IDN" per Preliminary Recommendation 2.1 Public Comment.*

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B4:** What should an application process look like in terms of timing and sequence for an existing and future Registry Operator with respect to applying or activating their allocatable variant TLD labels?

**Final Recommendation 3.2:** A future registry operator who wishes to apply for an allocatable variant label of its existing gTLD must submit an application during an application round.

*\*Use "existing" when referring to all of the gTLDs that have been delegated in the root zone, remove "2012 round," and remove "IDN" in order to future-proof potential updates to the RZ-LGR, per Preliminary Recommendations 1.1-2.1 Public Comments.*

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.3:** Applications for allocatable variant labels of existing gTLDs can be submitted during the immediate next application round of the New gTLD Program and any subsequent rounds.

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<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
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**Final Recommendation 3.4:** A future applicant applying for a primary gTLD string together with its allocatable variant label(s) in the same round is required to submit one application for the primary gTLD string and variant label(s).

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<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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**Final Recommendation 3.25:** After submission of an application, the applicant is allowed to withdraw an applied-for variant label from that application, but is not allowed to add any other variant label that was not originally applied-for in that application. Only an applicant for a .Brand TLD string whose applied-for primary gTLD string is placed in a contention set is allowed to change its applied-for primary string and allocatable variant label(s) under the condition set out in SubPro PDP Recommendation 20.8.

*\*Final Recommendation 3.25 was developed in response to a question raised via Public Comment.*

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<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
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**Final Recommendation 3.5:** In addition to explaining the mission and purpose of the applied-for primary gTLD string or existing gTLD, the applicant seeking one or more gTLD variant labels will describe the justification of such need. The justification given by the applicant shall at minimum provide the following information:

3.5.1 The meaning or intended meaning (for non-dictionary words) of each of the applied-for variant label(s), including sources;

3.5.2 Explanation of how the primary and variant labels are considered the same;

3.5.3 Explain the benefits and the user communities who will benefit from the introduction of the applied-for variant label(s); and

3.5.4 A description of the steps that the applicant will take to minimize the operational and management complexities of variant gTLDs and variant domain names that impact registrars, resellers and/or registrants.

*\*Final Recommendation 3.5 and Implementation Guidance 3.6 aim to strike a balance with Final Recommendations 3.11, 3.12, and 8.1, which were perceived as "non-conservative" by some Public Comment respondents - not to place arbitrary constraints that may discourage gTLD variant label applicants, but instead chose to enhance certain evaluation elements that are built into the application process, with the goal of supporting efficacy in the introduction of gTLD variant labels in a secure and stable manner.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	The WG's strengthening of Final Recommendation 3.5 and Implementation Guidance 3.6 help to ensure that gTLD variant labels are introduced and managed in a safe and secure manner. Read together with Final Recommendation 3.7, Implementation Guidance 3.8, and Implementation Guidance 3.9, the Final Recommendation 3.5 and Implementation Guidance 3.6 provide useful guidance for efforts to mitigate the potential risks associated with variant management both before and after a string is delegated. The WG should be congratulated for taking into account the individual end user perspective in balancing the potential risk of user confusion and potential for harm through exploitation of such user confusion, against the utility of a language's unconditional need for, and use of variant TLDs to facilitate a better end-user experience.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
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<b>Do not support Recommendation</b>				
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**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Implementation Guidance 3.6:** With respect to the evaluation of the information submitted per Final Recommendation 3.5:  
 3.6.1 The evaluation panel must include evaluators with relevant script expertise;  
 3.6.2 The evaluation panel should apply criteria based on a general standard of reasonableness and the criteria must be established during implementation;  
 3.6.3 Consistent with Recommendation 27.2 of the SubPro PDP Final Report, evaluation scores on the questions should be limited to a pass/fail scale (0-1 points only);  
 3.6.4 The applicant must pass each element to enable the applied-for variant label to proceed to the next stage of the application process; and  
 3.6.5 The evaluation outcome of any one applied-for variant label should not impact the evaluation outcome of any other applied-for variant label in the application (including the primary gTLD string).

*\*Final Recommendation 3.5 and Implementation Guidance 3.6 aim to strike a balance with Final Recommendations 3.11, 3.12, and 8.1, which were perceived as "non-conservative" by some Public Comment respondents - not to place arbitrary constraints that may discourage gTLD variant label applicants, but instead chose to enhance certain evaluation elements that are built into the application process, with the goal of supporting efficacy in the introduction of gTLD variant labels in a secure and stable manner.*

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**Charter Question D1b:** Charter Question D1b: What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.7:** A future applicant must be required to demonstrate its ability to manage the applied-for primary gTLD string and applied-for allocatable variant label(s) from both a technical and operational perspective. The same requirement applies to registry operators who wish to apply for allocatable variant label(s) of their existing gTLDs.

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<b>Support Recommendation as written</b>				
1	ALAC	The WG's strengthening of Final Recommendation 3.5 and Implementation Guidance 3.6 help to ensure that gTLD variant labels are introduced and managed in a safe and secure manner. Read together with Final Recommendation 3.7, Implementation Guidance 3.8, and Implementation Guidance 3.9, the Final Recommendation 3.5 and Implementation Guidance 3.6 provide useful guidance for efforts to mitigate the potential risks associated with variant management both before and after a string is delegated. The WG should be congratulated for taking into account the individual end user perspective in balancing the potential risk of user confusion and potential for harm through exploitation of such user confusion, against the utility of a language's unconditional need for, and use of variant TLDs to facilitate a better end-user experience.	Thank you for the input.	
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**Implementation Guidance 3.8:** The evaluation of capability to manage the variant label set should be closely tied to the overall technical capability evaluation. The evaluation should be based on measurable criteria including, but not limited to, the performance of Critical Functions with respect to second-level registrations under the primary gTLD string and the applied-for allocatable variant label(s).

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<b>Support Recommendation as written</b>				
1	ALAC	The WG's strengthening of Final Recommendation 3.5 and Implementation Guidance 3.6 help to ensure that gTLD variant labels are introduced and managed in a safe and secure manner. Read together with Final Recommendation 3.7, Implementation Guidance 3.8, and Implementation Guidance 3.9, the Final Recommendation 3.5 and Implementation Guidance 3.6 provide useful guidance for efforts to mitigate the potential risks associated with variant management both before and after a string is delegated. The WG should be congratulated for taking into account the individual end user perspective in balancing the potential risk of user confusion and potential for harm through exploitation of such user confusion, against the utility of a language's unconditional need for, and use of variant TLDs to facilitate a better end-user experience.	Thank you for the input.	
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5	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and annual registration fees for variant TLDs? [Should any specific implementation guidance be provided?](#)

**Implementation Guidance 3.9:** Within 15 months of the delegation of the first gTLD variant label and every 24 months thereafter, ICANN org should conduct research in order to identify whether any additional criteria or tests should be used, as part of the application process, to evaluate the technical and operational capability of an applicant to manage a variant label set at the registry level. ICANN org must offer the community an opportunity to provide input on the scope of the research to be undertaken, as well as any proposed outputs on additional criteria or tests, and such outputs should not be applied retroactively.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	The WG's strengthening of Final Recommendation 3.5 and Implementation Guidance 3.6 help to ensure that gTLD variant labels are introduced and managed in a safe and secure manner. Read together with Final Recommendation 3.7, Implementation Guidance 3.8, and Implementation Guidance 3.9, the Final Recommendation 3.5 and Implementation Guidance 3.6 provide useful guidance for efforts to mitigate the potential risks associated with variant management both before and after a string is delegated. The WG should be congratulated for taking into account the individual end user perspective in balancing the potential risk of user confusion and potential for harm through exploitation of such user confusion, against the utility of a language's unconditional need for, and use of variant TLDs to facilitate a better end-user experience.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	BC			
5	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\), including the application fees](#) and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.10:** The fee structure associated with future applications that include variant label(s), and variant label applications from registry operators of existing gTLDs, must be consistent with the principle of cost recovery reflected in the 2012 Applicant Guidebook and affirmed by the New gTLD Subsequent Procedures PDP.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	BC			
5	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\), including the application fees](#) and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.11:** A future applicant applying for a primary gTLD string and up to four (4) of that string's allocatable variant labels during an application round must incur the same base application fee as any gTLD applicant who does not apply for variant labels in that round.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
1	BC	<p>The Final report recommends (3.11) that up to 4 variant TLDs can be applied in the immediate subsequent round, whereas most of the 2012 round IDN applicants (with majority in Chinese / Han script) required only one variant string in its application document. It also recommends (3.14.1) a complete application fee waiver if the 2012 IDN applicant applied up to 4 variant TLDs in the immediate subsequent round. BC objects to these two recommendations and believes that the ePDP team made the recommendations contrary to the "Conservatism" principle. BC believes that the followings should be the reasonable path forward:</p> <ul style="list-style-type: none"> <li>• Based on its 2012 submission, up to 1 variant per 2012 IDN gTLD should be allowed to have a one-time application fee waived. Additional variant TLD(s) should be allowed with additional base fee(s) per variant TLD charged by ICANN.</li> <li>• No-ceiling rule applied to IDN variant gTLD in the subsequent round. Each variant TLD(s) added into the Applicant's application document should be evaluated with additional base fee(s) per variant TLD charged by ICANN.</li> </ul>	Thank you for the input.	
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\), including the application fees](#) and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.12:** Any applicant applying for more than four (4) allocatable variant labels of a primary gTLD string in an application round may incur additional fees that ICANN org considers to be proportionate to any additional costs associated with evaluating the application and consistent with the cost recovery principle.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	BC			
5	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\), including the application fees](#) and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.13:** A future registry operator applying only for allocatable variant label(s) of its delegated primary gTLD must incur a discounted base application fee. ICANN org will decide on the discount based on what it considers to be proportionate to any costs associated with evaluating the application and consistent with the cost recovery principle.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		NA		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	BC			
5	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\), including the application fees](#) and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.14:** If a registry operator from the 2012 round applies for up to four (4) allocatable variant labels of its existing IDN gTLD:  
 3.14.1 in the immediate next application round, the base application fee will be waived for that application as a one-time exception; or  
 3.14.2 in any application round subsequent to the immediate next application round, that application must incur a discounted base application fee as set out in Final Recommendation 3.13.

If a registry operator from the 2012 round applies for more than four (4) allocatable variant labels of its existing IDN gTLD:  
 3.14.3 in the immediate next application round, that application may incur additional fees as set out in Final Recommendation 3.12; or  
 3.14.4 in any application round subsequent to the immediate next application round, that application must incur a discounted base application fee as set out in Final Recommendation 3.13 AND may incur additional fees as set out in Final Recommendation 3.12.

*\*Final Recommendation 3.14 only impacts existing IDN gTLDs from the 2012 round - specifically developed for the registry operators of existing IDN gTLDs delegated as a result of the 2012 round.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
1	BC	The Final report recommends (3.11) that up to 4 variant TLDs can be applied in the immediate subsequent round, whereas most of the 2012 round IDN applicants (with majority in Chinese / Han script) required only one variant string in its application document. It also recommends (3.14.1) a complete application fee waiver if the 2012 IDN applicant applied up to 4 variant TLDs in the immediate subsequent round. BC objects to these two recommendations and believes that the ePDP team made the recommendations contrary to the "Conservatism" principle. BC believes that the followings should be the reasonable path forward: <ul style="list-style-type: none"> <li>• Based on its 2012 submission, up to 1 variant per 2012 IDN gTLD should be allowed to have a one-time application fee waived. Additional variant TLD(s) should be allowed with additional base fee(s) per variant TLD charged by ICANN.</li> <li>• No-ceiling rule applied to IDN variant gTLD in the subsequent round. Each variant TLD(s) added into the Applicant's application document should be evaluated with additional base fee(s) per variant TLD charged by ICANN.</li> </ul>	Thank you for the input.	
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

**Final Recommendation 3.15:** As a one-time exception for the immediate next application round, applications for allocatable variant labels of existing IDN gTLDs from the 2012 round must receive priority in processing order ahead of all other new gTLD applicants, including the IDN applicants that elect to participate in the prioritization draw.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
1	ALAC	We strongly support the step taken by the WG to apply the Conservatism principle to moderate an applicant's ability to seek one or more allocatable variant labels to their respective applied-for string or existing TLD.	Thank you for the input.	
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	Timileyin Adisa			
3	RrSG (Zoe Bonython)			
4	BC			
5	RySG (Elizabeth Bacon)			

**Charter Question B5:** Do restrictions that apply to a TLD (e.g., community TLDs, dot brand TLDs) also apply to its variants? Are these labels equally treated as different versions of the same string, or completely independent strings not bound by the same restrictions?

**Final Recommendation 3.16:** An applied-for allocatable variant label must be subject to the same application requirements and evaluation criteria as the associated primary gTLD string. Specifically, the same documentation requirements apply to both the primary gTLD string and its applied-for allocatable variant label(s). With respect to the three non-standard application types of gTLDs as identified by the SubPro PDP, this means that:

3.16.1 An applicant for a **Community-based TLD string and its allocatable variant label(s)** is required to submit a written endorsement of its applied-for primary gTLD string and applied-for allocatable variant label(s) from established institution(s) representing the community that the applicant has named.

3.16.2 An applicant for a **Geographic Name TLD string and its allocatable variant label(s)** is required to submit documentation of support or non-objection to its applied-for primary gTLD string and applied-for allocatable variant label(s) from relevant governments or public authorities.

3.16.3 An applicant for a **Brand TLD string and its allocatable variant label(s)** is required to submit proof that its applied-for primary gTLD string and applied-for allocatable variant label(s) are identical to registered trademarks owned and used by the registry operator or its affiliate.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A7:** What mechanism or criteria should be used to identify the scripts/languages appropriate for single-character TLDs? Once those scripts/languages are identified, what mechanism or criteria should be used to identify a specific list of allowable characters which can be used as a single-character TLD within such scripts/languages? Should any specific implementation guidance be provided? Furthermore, should the relevant GP tag these code points in the RZ-LGR for a consistent analysis and to ease their identification and algorithmic calculation?

**Final Recommendation 3.17:** The EPDP Team affirmed the Recommendation 25.4 in the SubPro PDP Final Report that single-character gTLDs may only be allowed for limited scripts and languages where a character is an ideograph. At the time of the EPDP Team's deliberations, the only script that meets the criteria is the Han script, which is used in the Chinese, Japanese, and Korean languages. Nevertheless, applications for single-character gTLDs that are ideographs must not be accepted until relevant guidelines from the Chinese, Japanese, and Korean Generation Panels are developed, finalized after Public Comment, and implemented in the New gTLD Program. In the event that the Generation Panels determine such additional guidelines beyond the analysis already provided in the RZ-LGR unnecessary, applications for single-character gTLDs in the Han script shall be accepted.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E5:** Should the reserved strings ineligible for delegation for existing and future gTLDs be updated to include any possible variant labels?

**Final Recommendation 3.18:** The New gTLD Program Reserved Names list must not be expanded to include variant labels.

*\*\*The Reserved Names list" revised to "The New gTLD Program Reserved Names list" after Public Comment to avoid confusion with the terminology used in Specification 5 of the Registry Operator Agreement, which also refers to "Registry Reserved Names."*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E5:** Should the reserved strings ineligible for delegation for existing and future gTLDs be updated to include any possible variant labels?

**Preliminary Recommendation 3.19:** No application for a variant label of a New gTLD Program Reserved Name is allowed.

*\*Edits suggested to reflect ICANN org's suggestion for Rec 3.18.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E5:** Should the reserved strings ineligible for delegation for existing and future gTLDs be updated to include any possible variant labels?

**Final Recommendation 3.20:** The list of Strings Ineligible for Delegation must not be expanded to include variant labels.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E5:** Should the reserved strings ineligible for delegation for existing and future gTLDs be updated to include any possible variant labels?

**Final Recommendation 3.21:** Only the protected organizations on the list of Strings Ineligible for Delegation are allowed to apply for the allocatable variant label(s) of their protected string(s) at the top-level. Consistent with [Final Recommendation 3.1](#), an application for an allocatable variant label of a protected string cannot precede an application for the protected string, which serves as the primary label for generating the variant label.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A3:** If an applied-for TLD label, whose script is supported by the RZ-LGR, is determined to be "invalid", is there a reason NOT to use the evaluation challenge processes recommended by SubPro? If so, rationale must be clearly stated. If SubPro's recommendation on the evaluation challenge process should be used, what are the criteria for filing such a challenge? Should any additional specific implementation guidance be provided, especially pertaining to the challenge to the LGR calculation as it can have a profound, decimating impact on the use of RZ-LGR?

**Final Recommendation 3.22:** Only an applied-for gTLD string that conforms to the mandatory string requirements, including IDNA 2008 for IDN strings, as well as the RZ-LGR, can be submitted through the new gTLD application submission system.

Where the initial algorithmic check deems an applied-for gTLD string as "invalid" or "blocked" (where the applied-for string is a variant label), such application for a non-conforming string may be accepted but the applicant must be warned of its potential disqualification.

If the DNS Stability Panel (DSP) subsequently confirms the applied-for string as "invalid" or "blocked" per the RZ-LGR and disqualifies the application for the non-conforming string, the applicant may invoke the limited challenge mechanism for DNS Stability Review to seek a reassessment of the disqualification.

However, the applicant's ground to challenge is limited to a belief that its applied-for gTLD string is valid and allocatable as per the RZ-LGR and that the disqualification by the DSP was due to an incorrect assessment of the technical implementation of the RZ-LGR.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
		<b>Support Recommendation as written</b>		
	ALAC	In regards to a potential contradiction between the IDNs-EPDP Final Recommendation 3.22 and the Subsequent Procedure PDP Final Report Implementation Guidance 25.3 in respect of scripts not (or not yet) integrated into the Root Zone Label Generation Rules (RZ-LGR), the ALAC is of the view that the IDNs-EPDP Recommendation 3.22 (which in effect discourages applications for strings in scripts not yet integrated into the RZ-LGR) would be the more sensible way to proceed. It would not be prudent for ICANN to accept, and be obliged to process through Initial Evaluation, such applications (which SubPro PDP IG 25.3 suggested be allowed) if they have little to no chance of passing Initial Evaluation due to non-conformance to the RZ-LGR (since such scripts are not supported by the RZ-LGR). Not having to process such strings alleviates the demand for valuable evaluation resources.	Thank you for the input.	
		<b>Support Recommendation in line with wording change</b>		
		N/A		
		<b>Significant change required: changing intent and wording</b>		
		N/A		
		<b>Do not support Recommendation</b>		
		N/A		
		<b>No opinion / no response</b>		
1	Davis Lewis			
2	Timothy Abisa			
3	RySG (Zoe Bonython)			
4	ICG			
5	RySG (Elizabeth Bacon)			

**Charter Question A3:** If an applied-for TLD label, whose script is supported by the RZ-LGR, is determined to be “invalid”, is there a reason NOT to use the evaluation challenge processes recommended by SubPro? If so, rationale must be clearly stated. If SubPro’s recommendation on the evaluation challenge process should be used, what are the criteria for filing such a challenge? [Should any additional specific implementation guidance be provided](#), especially pertaining to the challenge to the LGR calculation as it can have a profound, decimating impact on the use of RZ-LGR?

**Implementation Guidance 3.23:** The new gTLD application submission system should issue a disqualification warning to the applicant, whose applied-for string conforms to the mandatory string requirement, when the initial algorithmic check finds the following: (i) the applied-for gTLD string is deemed “invalid”; and/or (ii) the applied-for variant label is deemed “invalid” or “blocked”. This warning recognizes the unlikely, but possible, situation that the RZ-LGR was programmed or incorporated into the application submission system incorrectly, and allows an opportunity for correction.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A3:** If an applied-for TLD label, whose script is supported by the RZ-LGR, is determined to be “invalid”, is there a reason NOT to use the evaluation challenge processes recommended by SubPro? If so, rationale must be clearly stated. If SubPro’s recommendation on the evaluation challenge process should be used, what are the criteria for filing such a challenge? Should any additional specific implementation guidance be provided, especially pertaining to the challenge to the LGR calculation as it can have a profound, decimating impact on the use of RZ-LGR?

**Final Recommendation 3.24:** An applied-for gTLD string that has been accepted through the new gTLD submission system and correctly assessed by the DNS Stability Panel as “invalid” or “blocked” (where the applied-for string is a variant label) is disqualified unless and until such a string is deemed valid and allocatable in a future version of the RZ-LGR, if any.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E3:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the string similarity review procedure for variant label applications of existing and future gTLDs.

**Final Recommendation 4.1:** The String Similarity Review must be modified to compare an applied-for primary gTLD string (no matter whether it is an ASCII string or an IDN string) and all of its allocatable variant label(s) against the following:

- 4.1.1 Existing gTLDs and all of their allocatable and blocked variant labels; and
- 4.1.2 Existing ccTLDs and all of their allocatable and blocked variant labels; and
- 4.1.3 Strings requested as IDN ccTLDs and all of their allocatable and blocked variant labels; and
- 4.1.4 Other applied-for gTLD strings and all of their allocatable and blocked variant labels; and
- 4.1.5 All strings on the New gTLD Program Reserved Names list and all of their allocatable and blocked variant labels; and
- 4.1.6 Any other two-character ASCII strings and all of their allocatable and blocked variant labels.

In addition, the blocked variant label(s) of an applied-for primary gTLD string must also be compared against the following:

- 4.1.7 Existing gTLDs and all of their allocatable variant labels; and
- 4.1.8 Existing ccTLDs and all of their allocatable variant labels; and
- 4.1.9 Strings requested as IDN ccTLDs and all of their allocatable variant labels; and
- 4.1.10 Other applied-for gTLD strings and all of their allocatable variant labels; and
- 4.1.11 All strings on the New gTLD Program Reserved Names list and all of their allocatable variant labels; and
- 4.1.12 Any other two-character ASCII strings and all of their allocatable variant labels.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E3:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the string similarity review procedure for variant label applications of existing and future gTLDs.

**Final Recommendation 4.2:** As an exception to the proposed modification to the String Similarity Review in accordance with [Preliminary Recommendation 4.1](#), the String Similarity Review Panel may decide whether and what blocked variant labels to omit when conducting a comparison. Any such decision by the String Similarity Review Panel must be based on guidelines and/or criteria that justify such an omission on the basis of a manifestly low level of confusability between the scripts of labels being compared.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E3:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the string similarity review procedure for variant label applications of existing and future gTLDs.

**Final Recommendation 4.3:** During implementation, the guidelines and/or criteria must be developed for use by the String Similarity Review Panel to decide on the omission of blocked variant labels when conducting a comparison.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E3a:** After a requested variant string is rejected as a result of a string similarity review, should the other variant strings in the same variant set remain allocatable? Should individual labels be allowed to have different outcomes/actions (e.g., some labels be blocked and some be allowed to continue with an application process)?

**Final Recommendation 4.4:** All labels from a variant label set, comprising the primary gTLD string and all of its allocatable and blocked variant labels, must share the same outcome out of the String Similarity Review. This means the String Similarity Review, in accordance with **Preliminary Recommendation 4.1-4.3**, determines that:

4.4.1 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to an existing gTLD, an existing ccTLD, a New gTLD Program Reserved Name, a two-character ASCII string, or any of the variant label(s) of the aforementioned categories of strings, the entire variant label set of the applied-for primary gTLD string will be ineligible to proceed in the application process; or

4.4.2 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to another applied-for primary gTLD string or any of its variant label(s), the entire variant label sets of the two applied-for primary gTLD strings will be placed in a contention set. Upon the resolution of the contention set, the application that prevails can proceed to the next stage of the application process.

4.4.3 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to a requested primary IDN ccTLD string or any of its variant label(s), ICANN org is expected to take the following approach to resolve the conflict:

4.4.3.1 If one of the applied-for primary TLD strings has completed its respective process before the other is lodged, that primary TLD string (and its approved variant label(s), if applicable) will be delegated.

4.4.3.1.1 An applied-for primary gTLD string that has successfully completed all relevant evaluation stages, including dispute resolution and string contention, if applicable, and is eligible for entry into a registry agreement will be considered complete, and therefore that gTLD application (primary gTLD string and applied-for variant label(s), if applicable) would not be disqualified by a newly-filed IDN ccTLD request.

4.4.3.1.2 A requested primary IDN ccTLD that is validated will be considered complete and therefore that IDN ccTLD request (primary IDN ccTLD string and requested variant label(s), if applicable) would not be disqualified by a newly-filed gTLD application.

4.4.3.2 In the case where neither application has completed its respective process, the gTLD application (including the applied-for variant label(s), if applicable) will be put on hold while the IDN ccTLD request (including the requested variant label(s), if applicable) is undergoing evaluation.

4.4.3.2.1 Where the gTLD application (including the applied-for variant label(s), if applicable) does not have the support or non-objection, when required, from the relevant government or public authority, the validated IDN ccTLD request (including the requested variant label(s), if applicable) will prevail and the gTLD application is not eligible to proceed in the application process.

4.4.3.2.2 Where the IDN ccTLD request (including the requested variant label(s), if applicable) is withdrawn or fails evaluation, the gTLD application (including the applied-for variant label(s), if applicable) is eligible to proceed in the application process.

4.4.3.3 In the case where the gTLD application (including the applied-for variant label(s), if applicable) has obtained the support or non-objection of the relevant government or public authority, but is ineligible to proceed due to conflict with an IDN ccTLD request, a full refund of the evaluation fee is available to the gTLD applicant if its application was submitted prior to the publication of the IDN ccTLD request.

4.4.4 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to an applied-for primary gTLD string or any of its variant label(s) that has been held over from a previous application round and still in progress, the newly submitted application will be put on hold until the outcome of the application from the previous round has been determined.

4.4.4.1 If the application from a previous round successfully completes evaluation and is eligible for entry into a registry agreement, the entire variant label set of the newly applied-for primary gTLD string is ineligible to proceed in the application process.

4.4.4.2 If the application from a previous round is withdrawn or fails evaluation, the newly submitted application is eligible to proceed to the next stage of the application process.

*\*Based on input received following the Public Comment proceeding, the EPDP Team noticed an oversight of missing the mention of New gTLD Program Reserved Names and two-character ASCII strings. 4.4.1 was revised to include these missing elements. The EPDP Team also added 4.4.3 and 4.4.4 and their sub items to fill the gaps identified during the Final Report drafting process. In addition, taking into account a suggestion received from Public Comment, the EPDP Team provided a numbered list, replacing the original bullet list, to enhance clarity.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E2:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the objection process for the variant label applications of existing and future TLDs.

**Final Recommendation 5.1:** All applied-for allocatable gTLD variant labels must be subject to the objection processes.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E2:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the objection process for the variant label applications of existing and future TLDs.

**Final Recommendation 5.2:** A String Confusion Objection may be filed based on confusing similarity between combinations of applied-for primary gTLD strings and their variant labels established by [Final Recommendations 4.1-4.2](#). The possible combinations are as follows:

- 5.2.1. Applied-for primary gTLD string is confusingly similar to the primary string of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.2. Applied-for primary gTLD string is confusingly similar to an allocatable variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.3. Applied-for primary gTLD string is confusingly similar to a blocked variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.4. An allocatable variant label of an applied-for primary gTLD string is confusingly similar to the primary string of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.5. An allocatable variant label of an applied-for primary gTLD string is confusingly similar to an allocatable variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.6. An allocatable variant label of an applied-for primary gTLD string is confusingly similar to a blocked variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.7. A blocked variant label of an applied-for primary gTLD string is confusingly similar to the primary string of an existing gTLD/ccTLD or another applied-for primary gTLD string
- 5.2.8. A blocked variant label of an applied-for primary gTLD string is confusingly similar to an allocatable variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string

The only combination of strings that cannot form the basis of a String Confusion Objection is that of a blocked variant label of an applied-for primary gTLD string being claimed as confusingly similar to the blocked variant label of an existing gTLD/ccTLD or another applied-for primary gTLD string. In its objection, the objector must specify the confusing similarity between the combination of strings within the limits of String Similarity Review in accordance with [Final Recommendations 4.1-4.2](#).

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E2:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the objection process for the variant label applications of existing and future TLDs.

**Final Recommendation 5.3:** The outcomes of the String Confusion Objection are consistent with the 2012 Applicant Guidebook. Specifically:  
 5.3.1. If the objection prevails and where the objector is an existing TLD registry operator, then that application is ineligible to proceed to the next stage of the application process; or  
 5.3.2. If the objection prevails and where the objector is another applicant, then the entire variant label sets in both that application and the objector's application must be placed in a contention set.  
 5.3.3. If the objection does not prevail, then that entire application may proceed to the next stage of the application process.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E2:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the objection process for the variant label applications of existing and future TLDs.

**Final Recommendation 5.4:** With respect to the Limited Public Interest Objection, Legal Rights Objection, and Community Objection, an objection may be filed against only the applied-for primary gTLD strings and/or the applied-for allocatable variant labels. For avoidance of doubt, the objection cannot be filed against non-applied-for allocatable variant labels or blocked variant labels.

Specifically, the objection can be filed against one of the following options:

5.4.1. Only the applied-for primary gTLD string, or

5.4.2. One or more of the applied-for allocatable variant label(s), or

5.4.3. A combination of the applied-for primary gTLD string and one or more applied-for allocatable variant label(s)

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E2:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the objection process for the variant label applications of existing and future TLDs.

**Final Recommendation 5.5:** With respect to the Limited Public Interest Objection, Legal Rights Objection, and Community Objection, the possible outcomes are as follows:

5.5.1. If an objection against an applied-for primary gTLD string prevails, then that entire application is ineligible to proceed to the next stage of the application process.

5.5.2. If an objection against only one or more applied-for allocatable variant label(s) prevails, then that application for the applied-for primary gTLD string and other unaffected applied-for allocatable variant label(s) may proceed to the next stage of the application process without the applied-for allocatable variant label(s) which are rendered ineligible by the objection.

5.5.3. If the objection does not prevail, then that entire application may proceed to the next stage of the application process.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E4:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the string contention resolution mechanism for variant label applications of existing and future new gTLDs.

**Final Recommendation 6.1:** An applied-for primary gTLD string that is also a variant label of another applied-for primary gTLD string, as calculated by the RZ-LGR, must be placed in a contention set.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question E4:** The WG and the SubPro IRT to coordinate to ensure consistency in the implementation of the string contention resolution mechanism for variant label applications of existing and future new gTLDs.

**Final Recommendation 6.2:** If an applied-for primary gTLD string or its variant label is found to be confusingly similar to another applied-for primary gTLD string or its variant label, the entire variant label sets in the affected applications shall be placed in a contention set together. This applies no matter whether the primary gTLD string is an ASCII string or an IDN string.

*\*The EPDP Team considered a comment received, and agreed to replace the original phrase “processed in the contention set” in the recommendation language with “placed in a contention set” to clarify the intent.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
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		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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**Charter Question D1a:** Should each TLD label be the subject of a separate Registry Agreement with ICANN? If not, should each TLD label along with its variant labels be subject to one Registry Agreement with the same entity?

**Final Recommendation 7.1:** Any future IDN gTLD along with its variant labels (if any) must be subject to one Registry Agreement with each variant label having the same service level agreements (SLAs) and other operational requirements.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D1a:** Should each TLD label be the subject of a separate Registry Agreement with ICANN? If not, should each TLD label along with its variant labels be subject to one Registry Agreement with the same entity?

**Implementation Guidance 7.2:** A new specification or an amendment to the Base Registry Agreement for any future gTLD along with its variant label(s) may need to be developed to incorporate variant management provisions.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
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1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D1a:** Should each TLD label be the subject of a separate Registry Agreement with ICANN? If not, should each TLD label along with its variant labels be subject to one Registry Agreement with the same entity?

**Final Recommendation 7.3:** Any existing registry operator that is successful in its future application for its variant label(s) must be required to adopt contractual terms to accommodate the newly approved variant label(s) by way of a new Specification to its existing Registry Agreement.

*\* Preliminary Recommendation 7.3 only impacts existing IDN gTLDs from the 2012 round.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? [What should be the associated fee\(s\)](#), including the application fees and [annual registration fees for variant TLDs](#)? Should any specific implementation guidance be provided?

**Final Recommendation 7.4:** The registry fixed fee for a gTLD registry operator that operates the delegated gTLD label(s) from a variant label set must be the same as a gTLD registry operator of a single gTLD.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
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**Charter Question D1b:** What should be the process by which an existing registry operator could apply for, or be allocated, a variant for its existing gTLD? What should be the process by which an applicant applying for a new IDN gTLD could seek and obtain any allocatable variant(s)? What should be the associated fee(s), including the application fees and [annual registration fees for variant TLDs](#)? Should any specific implementation guidance be provided?

**Final Recommendation 7.5:** The calculation of the registry-level transaction fee must be based on the cumulative number of domain name registrations of the combined delegated gTLD label(s) from a variant label set.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B2:** Both the SubPro PDP and the Staff Paper recommend that variant TLDs be operated by the same back-end registry service provider, the organization providing one or more registry services (e.g., DNS, DNSSEC, RDDS, EPP) for a registry operator. Should this recommendation be extended to existing TLDs and their variant TLD labels?

**Final Recommendation 7.6:** The registry service provider for each one of the Critical Functions as defined in the Base Registry Agreement for an existing gTLD must be the same as for its delegated variant labels. The Critical Functions are: DNS Service, DNSSEC proper resolution, EPP, RDDS, and Data Escrow.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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4	RrSG (Zoe Bonython)			
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**Charter Question B2:** Both the SubPro PDP and the Staff Paper recommend that variant TLDs be operated by the same back-end registry service provider, the organization providing one or more registry services (e.g., DNS, DNSSEC, RDDS, EPP) for a registry operator. Should this recommendation be extended to existing TLDs and their variant TLD labels?

**Final Recommendation 7.7:** If the registry operator changes its gTLD's registry service provider for any one of the Critical Functions, the variant label(s) of that gTLD must simultaneously transition to the same registry service provider for that Critical Function.

*\*Refrain from mentioning "the 2012 round," Remove the mention of "IDN," Include "Critical Functions"*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D2:** In order to ensure that the same entity principle is maintained for a gTLD and its allocated variant TLD labels, what are the operational and legal impacts to the:  
 - [Registry Transition Process or Change of Control in the Registry Agreement](#);  
 - Emergency Back-End Registry Operator (EBERO) provisions; and  
 - Reassignment of the TLD as a result of the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP)?

**Final Recommendation 7.8:** In the event a Registry Transition or Change of Control process is initiated for a gTLD, the process must encompass the gTLD and all its allocated and delegated variant label(s), if any, at the same time.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D2:** In order to ensure that the same entity principle is maintained for a gTLD and its allocated variant TLD labels, what are the operational and legal impacts to the:

- [Registry Transition Process or Change of Control in the Registry Agreement](#);
- Emergency Back-End Registry Operator (EBERO) provisions; and
- Reassignment of the TLD as a result of the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP)?

**Final Recommendation 7.9:** After the Registry Transition Process or Change of Control process is completed for a gTLD and its allocated and delegated variant label(s), only the successor registry operator can apply for the other non-delegated, allocatable variant label(s) of that gTLD in accordance with the "same entity" principle pursuant to [Final Recommendation 2.1](#).

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
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2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D2:** In order to ensure that the same entity principle is maintained for a gTLD and its allocated variant TLD labels, what are the operational and legal impacts to the:

- Registry Transition Process or Change of Control in the Registry Agreement;
- [Emergency Back-End Registry Operator \(EBERO\) provisions](#); and
- Reassignment of the TLD as a result of the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP)?

**Final Recommendation 7.10:** Emergency transition of a gTLD to an EBERO provider must include the allocated and delegated variant label(s) of that gTLD, if any. All these labels must be transitioned to the same EBERO provider at the same time.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D2:** In order to ensure that the same entity principle is maintained for a gTLD and its allocated variant TLD labels, what are the operational and legal impacts to the:

- Registry Transition Process or Change of Control in the Registry Agreement;
- Emergency Back-End Registry Operator (EBERO) provisions; and
- [Reassignment of the TLD as a result of the Trademark Post-Delegation Dispute Resolution Procedure \(TM-PDDRP\)?](#)

**Final Recommendation 7.11:** In the event a gTLD is reassigned as a result of a TM-PDDRP determination, that reassignment must include all allocated and delegated variant label(s) of the gTLD, if any, at the same time.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

<b>Charter Question D3:</b> In order to ensure that the same entity principle is maintained, what are the operational and legal impacts to the data escrow policies, if any.				
<b>Final Recommendation 7.12:</b> The same data escrow provider must be contracted for the gTLD and its allocated and delegated variant label(s).				
#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D3:** In order to ensure that the same entity principle is maintained, what are the operational and legal impacts to the data escrow policies, if any.

**Implementation Guidance 7.13:** The escrow data associated with each gTLD variant label should be stored in separate files.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B5:** Do restrictions that apply to a TLD (e.g., community TLDs, dot brand TLDs) also apply to its variants? Are these labels equally treated as different versions of the same string, or completely independent strings not bound by the same restrictions?

**Final Recommendation 7.14:** The applied-for primary gTLD string and any allocatable variant label sought by the applicant must be bound by the same restrictions, which will become contractual requirements upon execution of the Registry Agreement. Similarly, any allocatable variant label sought by an existing registry operator will be bound by the same restrictions as the existing gTLD upon execution of the new Specification to its existing Registry Agreement for the newly approved variant label(s). The restrictions in this recommendation refer to the differential treatment and requirements applied to non-standard types of gTLDs, which are Community-based TLDs, Brand TLDs, Geographic Name TLDs, as well as TLDs subject to Category 1 Safeguards.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A5:** Should there be a ceiling value or other mechanism to ensure that the number of delegated top-level variant labels remains small, understanding that variant labels in the second level may compound the situation? Should additional security and stability guidelines be developed to make variant domains manageable at the registry, registrar, and registrant levels?

**Final Recommendation 8.1:** No ceiling value for delegated top-level variant labels from a variant label set is necessary as existing measures in the RZ-LGR to reduce the number of allocatable top-level variant labels, as well as economic, operational, and other factors that may impact the decision to apply for variant labels, will keep the number of delegated top-level variant labels conservative.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A5:** Should there be a ceiling value or other mechanism to ensure that the number of delegated top-level variant labels remains small, understanding that variant labels in the second level may compound the situation? [Should additional security and stability guidelines be developed to make variant domains manageable at the registry, registrar, and registrant levels?](#)

**Final Recommendation 8.2:** In order to encourage a positive and predictable registrant experience, ICANN org must, during implementation, create a framework for developing guidelines for the management of gTLDs and their variant labels at the top-level by registries and registrars.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A5:** Should there be a ceiling value or other mechanism to ensure that the number of delegated top-level variant labels remains small, understanding that variant labels in the second level may compound the situation? [Should additional security and stability guidelines be developed to make variant domains manageable at the registry, registrar, and registrant levels?](#)

**Implementation Guidance 8.3:** The framework should outline the scope and the steps involved in developing future non-binding guidelines, which at a minimum should involve relevant stakeholders, such as registries, registrars, and where feasible, registrants who have experience with IDNs and variant labels.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B4:** What should an application process look like in terms of timing and sequence for an existing and future Registry Operator with respect to applying or activating their allocatable variant TLD labels?

**Final Recommendation 8.4:** Applicants for a primary gTLD string and its applied-for allocatable variant label(s) that pass evaluation must be subject to the terms and conditions, as recommended by the SubPro PDP, in respect of the timeframe for delegation, including the ability to apply for an extension of time for delegation.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question B4:** What should an application process look like in terms of timing and sequence for an existing and future Registry Operator with respect to applying or activating their allocatable variant TLD labels?

**Final Recommendation 8.5:** The sequence for delegating the applied-for primary gTLD string and the applied-for allocatable variant label(s) that pass evaluation should be determined by the registry operator.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A6:** To what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants (if any), which are not validated by a script LGR, to be grandfathered? If not, what is the recommended approach to address changes to the current version of the RZ-LGR that assign different disposition values to existing TLDs?

**Final Recommendation 8.6:** Any delegated gTLDs and their delegated and allocated variant labels (if any) not validated by a proposed RZ-LGR update must be grandfathered. In other words, the proposed update will apply to future new gTLDs and their variant labels and will not be retroactive; there will be no change to the contractual and delegation state of the delegated gTLDs and their delegated and allocated variant labels (if any), which predate the proposed RZ-LGR update and are subject to the version of RZ-LGR when those gTLDs and variant labels were initially applied for upon the finalization of the application process.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A6:** To what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants (if any), which are not validated by a script LGR, to be grandfathered? If not, what is the recommended approach to address changes to the current version of the RZ-LGR that assign different disposition values to existing TLDs?

**Final Recommendation 8.7:** For all future versions of the RZ-LGR, Generation Panels (GPs) and the Integration Panel (IP) should follow the stability principle in the LGR Procedure and make best efforts to retain full backward compatibility with delegated gTLDs and their delegated and allocated variant labels (if any). The LGR Procedure must be updated to specify the exceptional circumstances, to the extent known to the GPs and IP, that could result in a proposed update to the RZ-LGR not being able to retain full backward compatibility.

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A6:** To what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants (if any), which are not validated by a script LGR, to be grandfathered? If not, what is the recommended approach to address changes to the current version of the RZ-LGR that assign different disposition values to existing TLDs?

**Final Recommendation 8.8:** In the unexpected event where a proposed update to the RZ-LGR is unable to retain full backward compatibility for validating any delegated gTLDs as well as their delegated and allocated variant labels (if any), the relevant GP must call out the exception during a Public Comment period and explain the reasons for such exception. The Public Comment period should also include the elements in the following Implementation Guidance.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A6:** To what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants (if any), which are not validated by a script LGR, to be grandfathered? If not, what is the recommended approach to address changes to the current version of the RZ-LGR that assign different disposition values to existing TLDs?

**Implementation Guidance 8.9:** The GP explanation should identify security and stability risks (if any), as well as possible actions to mitigate the risks associated with allowing a delegated gTLD and its delegated and allocated variant labels (if any) to be grandfathered. There should also be an assessment, conducted by ICANN org, of the potential impact of grandfathering on registries, registrars, registrants, and endusers, as well as proposed measures to reduce the negative impact. As part of the assessment, ICANN org should facilitate a timely dialogue between the registry operator of the grandfathered gTLD, relevant function(s) in ICANN org, the GP, other experts and affected parties.

Notwithstanding the recommendation to grandfather affected gTLDs, in the event security and stability risks are identified, ICANN org and the affected registry operator should discuss possible measures to minimize the risks that would result in minimal disruption to registries, registrars, registrants, and end-users.

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D8:** What additional updates to the Registry Agreement are necessary to ensure the labels under variant TLDs follow the “same entity” rule?

**Final Recommendation 8.10:** A primary gTLD that is removed from the root zone, either voluntarily or involuntarily, must also require the removal of its delegated variant label(s) from the root zone.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D8:** What additional updates to the Registry Agreement are necessary to ensure the labels under variant TLDs follow the “same entity” rule?

**Final Recommendation 8.11:** A delegated variant label that is voluntarily removed from the root zone will not require the removal of the associated primary gTLD or its other delegated variant label(s).

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D8:** What additional updates to the Registry Agreement are necessary to ensure the labels under variant TLDs follow the “same entity” rule?

**Implementation Guidance 8.12:** In the event that domain name registrations exist at the second-level under a delegated variant label, its registry operator’s request for its removal from the root zone should include a transition plan, to be submitted to ICANN org for review, for the existing registrations under that variant label.

*\*The EPDP Team considered a concern raised in Public Comment and agreed to develop this implementation guidance to clarify the expectation that a transition plan is required and should be reviewed by ICANN org, in the event that domain name registrations exist under a gTLD variant label which its registry operator intends to remove.*

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question D8:** What additional updates to the Registry Agreement are necessary to ensure the labels under variant TLDs follow the “same entity” rule?

**Final Recommendation 8.13:** In the event that a gTLD is removed from the root zone as a consequence of its registry operator’s breach of the Registry Agreement, the rest of its variant label set, if any, must also be removed from the root zone.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A9:** A given label in an Internationalized Domain Label (IDL) set may be in one of the following non-exhaustive status: delegated, withheld-same-entity, blocked, allocated, rejected. The WG and the SubPro IRT to coordinate and develop a consistent definition of variant label status in the IDL set.

**Final Recommendation 9.1:** A given variant label must have one of the following label states at any one time: delegated, allocated, withheld-same-entity, blocked, or rejected. If the same terminology is used for certain label states and new gTLD application states, their respective definitions must be consistent.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
2	ALAC			
3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A9:** A given label in an Internationalized Domain Label (IDL) set may be in one of the following non-exhaustive status: delegated, withheld-same-entity, blocked, allocated, rejected. The WG and the SubPro IRT to coordinate and develop a consistent definition of variant label status in the IDL set.

**Implementation Guidance 9.2:** The label state for each variant label of an already delegated primary gTLD should be recorded and tracked by ICANN org so long as the primary gTLD remains delegated. Such records, including historical ones, should be maintained in a practical manner and made publicly accessible.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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3	Timileyin Adisa			
4	RrSG (Zoe Bonython)			
5	BC			
6	RySG (Elizabeth Bacon)			

**Charter Question A10:** What is the procedure to change the label status for individual variant labels?

**Final Recommendation 9.3:** A variant label may go through the following transitions:

1. from "blocked" to "withheld-same-entity";
2. from "withheld-same-entity" to "blocked";
3. from "rejected" to "withheld-same-entity".
4. from "withheld-same-entity" to "allocated";
5. from "allocated" to "withheld-same-entity";
6. from "allocated" to "delegated"; and
7. from "delegated" to "allocated"

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<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
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**Charter Question A10:** What is the procedure to change the label status for individual variant labels?

**Implementation Guidance 9.4:** A variant label state transition may occur in scenarios including but not limited to the following:

1. **from “blocked” to “withheld-same-entity”:** This transition happens when a later version of the RZ-LGR increases the allocatable labels from a variant label set, making a previously blocked label into an allocatable one; when it happens, such a variant label automatically becomes withheld-same-entity.
2. **from “withheld-same-entity” to “blocked”:** This transition happens when a later version of the RZ-LGR reduces the allocatable labels from a variant label set, which is an unlikely but possible scenario; such a variant label which is no longer able to be allocated or delegated to the root zone becomes blocked.
3. **from “rejected” to “withheld-same-entity”:** This transition happens when the condition which led to the rejection of a label no longer applies; such a variant label can be treated as any other withheld-same-entity label.
4. **from “withheld-same-entity” to “allocated”:** This transition happens if a variant label was not initially applied for but later is; allocating a withheld variant label would require the application process for such a label.
5. **from “allocated” to “withheld-same-entity”:** This transition happens when a gTLD variant label completes the termination process, and the allocation in the root zone no longer remains in place.
6. **from “allocated” to “delegated”:** This transition happens when the allocated label has been placed as a gTLD in the root zone of the Domain Name System (DNS), which then facilitates the registry operator’s ability to commence the process of bringing the registry service into production.
7. **from “delegated” to “allocated”:** This transition happens when a gTLD is removed from the DNS; its allocation can still remain in place.

#	Contributor	Comment	ICANN Board Response	ICANN Board Action
<b>Support Recommendation as written</b>				
		N/A		
<b>Support Recommendation intent with wording change</b>				
		N/A		
<b>Significant change required: changing intent and wording</b>				
		N/A		
<b>Do not support Recommendation</b>				
		N/A		
<b>No opinion / no response</b>				
1	Davies Lewis			
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6	RySG (Elizabeth Bacon)			

No opinion / no response for items below	
<p><b>Charter Question A4:</b> Should the SubIR's recommendation be extended to existing TLDs that apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ LGR? Consider this question in tandem with B4 and by taking into account the data to be collected in the "Data and Metric Requirements" section of this charter. If not, what should be the process for an existing TLD registry who wishes to apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ LGR?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team agreed that this charter question is moot as all scripts of all existing delegated gTLDs from the 2012 round are already integrated into the RZ LGR version 5, which was published on 26 May 2022.</p>	
<p><b>Charter Question A2:</b> If some self-identified "variant" TLD labels by the former gTLD applicants are not found consistent with the calculation of the RZ LGR, but have been used to certain extent (e.g., used to determine string contention sets), how should such labels be addressed in order to conform to the LGR Procedure and RZ LGR calculations?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team agreed that no recommendation or implementation guidance is needed for the self-identified gTLD "variant" labels in the 2012 round, as they do not have legal standing and are for information purposes only. It does not matter whether any of the self-identified "variant" labels were used for any purpose in the 2012 round (if at all).</p>	
<p><b>Charter Question B3:</b> Beyond having the same Registry Operator and same back-end registry service provider, as referenced in B1 and B2, is there a need for additional constraints for the same entity requirement for the top-level?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team agreed that there was no need for additional constraints for the "same entity" requirement for the top-level beyond the current EPDP IDNs Phase 1 final recommendations and implementation guidance.</p>	
<p><b>Charter Question E6:</b> Is there any reason to permit the registration of gTLDs consisting of decorated two-character Latin labels which are not variant labels of any two-letter ASCII labels?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team agreed not to develop any additional recommendation on this topic but to rely on the existing process of using the String Similarity Review to check any applied-for gTLD string in any script, not limited to the Latin script, that may be potentially confusable with a two-character ASCII combination. The EPDP Team noted that such confusability issues may also exist in other scripts, such as Cyrillic, Ethiopic, Gujarati, Hebrew, and Malaysian scripts.</p>	
<p><b>Charter Question B4a:</b> For the variant labels with status "withheld for the same entity" (i.e., not requested for allocation in the application process), what role do they play?</p> <p><b>No Recommendation or Implementation Guidance:</b> It is only when an applied-for primary gTLD string is allocated or delegated as a result of the application being approved that its non-applied-for allocatable variant label(s) become "withheld for the same entity". The non-applied-for allocatable variant labels will be taken into account in at least three aspects of the evaluation process for new gTLD applications: 1) String Similarity Review, 2) String Confusion Objection, and 3) Contention Resolution.</p>	
<p><b>Charter Question E1:</b> In considering the conclusion(s) with respect to question B4a, what role, if any, do TLD labels "withheld for possible allocation" or "withheld for the same entity" play vis-a-vis:</p> <ul style="list-style-type: none"> <li>• objection process; and</li> <li>• string similarity review process?</li> </ul> <p><b>No Recommendation or Implementation Guidance:</b> It is only when an applied-for primary gTLD string is allocated or delegated as a result of the application being approved that its non-applied-for allocatable variant label(s) become "withheld for the same entity". The non-applied-for allocatable variant labels will be taken into account in at least three aspects of the evaluation process for new gTLD applications: 1) String Similarity Review, 2) String Confusion Objection, and 3) Contention Resolution.</p>	
<p><b>Charter Question E7:</b> Besides the objection process, string similarity review, and string contention resolution, what other ICANN policies and procedures should be updated to enforce the "same entity" rule and the use of RZ LGR as the look source to calculate the variant labels and disposition values?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team agreed that no additional recommendations need to be developed to address the singular/plural issues to complement its recommendations for the String Similarity Review.</p>	
<p><b>Charter Question A8:</b> What additional aspects of gTLD policies and procedures, which are not considered in the above charter questions, need to be updated to ensure that the validation of existing TLD labels and calculation of variant labels depend exclusively on the RZ LGR in a consistent manner?</p> <p><b>No Recommendation or Implementation Guidance:</b> The EPDP Team plans to address this question in Phase 2 of its deliberation, specifically under charter question D8, as this issue is more related to second-level domain name registrations.</p>	