ICANN | GNSO

Generic Names Supporting Organization

Final Report on the Latin Script Diacritics Policy Development Process

31 August 2026

Status of This Document

This is the Final Report of the GNSO Latin Script Diacritics Policy Development Process Working Group. This Final Report has been submitted to the GNSO Council for its consideration.

Preamble

The objective of this Final Report is to document the Latin Script Diacritics Policy Development Process (PDP) (hereafter referred to as "LD PDP") Working Group's (WG) deliberations on its 57 final recommendations and implementation guidance (hereafter referred to as "outputs"). This Final Report also documents the public comments received on its Initial Report and the LD PDP WG's subsequent analysis, as well as other pertinent information that provides background, context, and rationales for its final outputs.

Table of Contents

1 Executive Summary....3
2 LD PDP Working Group Approach....6
3 Glossary....10
4 Working Group Final Outputs....29
4.1 Charter Questions with Final Outputs.... 31
4.2 Charter Questions with No Final Outputs....112
5 GPI/HR Framework Analysis....115
6 Next Steps....117
Annex A LD PDP WG Charter....118
Annex B Consensus Designations....135
Annex C Stress Test: Edge Case Studies....138
Annex D Background....147
Annex E LD PDP WG Membership/Attendance....154
Annex F Community Input....158

1 Executive Summary

1.1 Introduction

During 2021–2024, the GNSO Council developed policy recommendations to define variant domain names at the top and second-level and to establish rules for variant management. However, there remained a gap for cases where a base ASCII generic top-level domain (gTLD) and its corresponding Latin diacritic[1] gTLD(s) are not variants of each other. Accordingly, the objective of the Latin Script Diacritics (LD) Policy Development Process (PDP) (hereafter referred to as "LD PDP") was to examine the circumstance in which a base ASCII gTLD and the LD version of the gTLD are not variants of each other, yet may be found visually confusingly similar, seeking to establish an appropriate framework – policy requirements and implementation mechanisms that are currently absent – which would allow a single gTLD registry operator to simultaneously operate both gTLDs.

On 13 November 2024, the GNSO Council initiated the LD PDP and chartered the LD PDP Working Group (WG; hereafter referred to as the "LD PDP WG" or "WG") on 19 December 2024.[2] The LD PDP WG commenced its work on 8 March 2025 during ICANN82 in Seattle, remaining focused on maintaining its narrow scope throughout its preliminary deliberations.[3] The Initial Report was published for Public Comment on 12 January 2026 for a 40-day period.

In July 2026, the LD PDP WG completed its substantive work, which included a comprehensive review of all the public comments received, incorporating relevant feedback and revising the work, as necessary. This process resulted in 57 policy outputs – including 45 final recommendations and 12 implementation guidance.

The LD PDP WG leadership team recommended "full consensus" designations for all Outputs. Following a 10-day Consensus Call period, the designations were confirmed by all the LD PDP WG Members.

For additional background on this PDP, please refer to "Annex D" of this report.

[1] Diacritics are marks added to a base letter or a character and used to modify sounds, or signify stressed syllables in many languages globally that utilize the Latin alphabet. The Domain Name System (DNS) was limited to the use of the ASCII characters. With the implementation of Internationalized Domain Names (IDNs), it now supports multiple scripts, as well as Latin alphabet-based characters with diacritics.

[2] See LD PDP WG Charter at https://gnso.icann.org/sites/default/files/policy/2025/draft/latin-script-diacritics-pdp-charter-final-28feb25-en.pdf

[3] See LD PDP project plan at https://icann-community.atlassian.net/wiki/x/MQTVBg

1.2 Final Outputs

Per the WG Charter, the WG agreed that it was important to reference previous bodies of work related to Internationalized Domain Names (IDNs) policy. Accordingly, the WG reviewed all elements of the policy in relation to LD – including the country code top-level domain (ccTLD) Fast Track Process, Final Report ccNSO PDP4 (de-)selection of IDNccTLDs (ccPDP4), Subsequent Procedures (SubPro) Policy Development Process (PDP) Final Report, and the Expedited Policy Development Process on IDNs (EPDP-IDNs) Phase 1 and Phase 2 – to determine whether any aspects were relevant or warranted further discussion. During this process, the WG decided to mirror the policy derived from both phases of EPDP-IDNs where applicable, updating the language to the relevant LD context and excluding any provisions that were not necessary.

Charter Question 1 is central to the issue that the LD PDP WG is seeking to resolve – establishing policy requirements and the implementation mechanisms that are currently absent for the LD gTLDs to simultaneously exist with its corresponding ASCII gTLD that have a non-variant relationship. The WG's responses to this question form the basis of the final outputs. Accordingly, the WG's responses and corresponding final outputs are organized into the following topics as prescribed in both Phase 1 and Phase 2 of the EPDP-IDNs:

- Topic 1: Requirements for the Set at the Top-level
- Topic 2: "Same Entity" Principle at the Top-level
- Topic 3: Application Submission, Administrative Check, Initial Evaluation
- Topic 4: Contractual Requirements
- Topic 5: Delegation and Removal
- Topic 6: Requirements for the Set at the Second-level
- Topic 7: "Same Entity" Principle at the Second-level and IDN Table Harmonization
- Topic 8: Adjustments in Registration Processes Pertinent to the Domain Name Lifecycle

Meanwhile, the WG's responses to Charter Questions 2, 3, and 4 are indirectly reflected in these outputs.[4]

There were a number of issues that required further consideration by the LD PDP WG following the review of the Public Comments received on the Initial Report; these are reflected in this Final Report. Some of these issues were substantive and had implications across multiple sections of the report – including topics related to application and evaluation requirements, contractual requirements, and delegation and removal requirements – resulting in corresponding revisions throughout. These issues are listed as follows:

- Requirements for the Set at both the top- and second-levels, including character eligibility and the permissible scope of the set
- Conservatism Principle for the LD PDP, noting that it is an exception process
- Fee-related policy, recognizing that it shall remain within ICANN org's operational discretion

[4] Further details on the WG's approach related to the ccTLD Fast Track Process, ccPDP4, SubPro Final Report, and EPDP-IDNs Phase 1 and Phase 2 are provided in the WG's responses to Charter Questions 2 and 3 in "Section 4."

Consequently, the LD PDP WG has developed 57 policy outputs – including 45 final recommendations and 12 implementation guidance – for the GNSO Council's consideration.

1.3 Conclusions and Next Steps

The Consensus Call on the outputs contained in this Final Report, as required by the GNSO WG Guidelines, was carried out by the LD PDP WG, as described in "Annex B: Consensus Designations." In summary, all of the 57 outputs (45 final recommendations and 12 implementation guidance) received "full consensus" support from the LD PDP WG. For further details about the decision-making methodology and consensus designation, please see "Section VI: Decision Making Methodologies" in the LD PDP WG Charter, which is contained in "Annex A" within this Final Report.

For next steps, this Final Report will be considered by the GNSO Council to determine the appropriate course of action. If the Final Report is approved by the GNSO Council, it will be forwarded to the ICANN Board of Directors for consideration and potential action in accordance with the ICANN Bylaws.

1.4 Other Relevant Sections of this Report

The following sections are included within this Final Report:

- Explanation of the WG's methods and process for achieving the final outputs, including final recommendations and implementation guidance;
- Glossary that provides definitions of the terms and phrases frequently used throughout this report;
- Responses to the Charter questions, including a compilation of all final recommendations, some of which include corresponding implementation guidance, and their rationales;
- WG's analyses on the impact of its recommendations on the Global Public Interest (GPI) and Human Rights (HR);
- LD PDP WG Charter;
- Consensus designations as a result of the LD PDP WG's Consensus Call;
- Documentation of the LD PDP WG's "Stress Testing Exercise of Edge Cases" to assess the soundness of its preliminary recommendations;
- Background of the PDP and issues under consideration;
- Documentation of who participated in the WG's deliberations, including attendance records, and links to Statements of Interest (SOIs);
- Documentation on the solicitation of community input through formal Supporting Organization (SO) / Advisory Committee (AC), and Stakeholder Group/Constituency (SG/C) channels and responses.

2 LD PDP Working Group Approach

This section provides an overview of the working methodology and approach of the WG. The points outlined below are meant to provide the reader with relevant background information on the WG's deliberations and processes. Note that this does not represent the entirety of the efforts and deliberations of the WG.

2.1 Project Plan

The LD PDP's first deliverable was to provide the GNSO Council with a project plan, setting out the anticipated time frame for deliberations on the WG's Charter topics and the target dates for key milestones. The project plan was provided to the GNSO Council for its consideration during the 10 April 2025 GNSO Council Meeting.

Per the WG Charter, the WG agreed that it was important to reference previous work related to IDNs policy and review all elements of the policy in relation to LD – including the ccTLD Fast Track Process, ccPDP4 Final Report, SubPro PDP Final Report, and the EPDP-IDNs Phase 1 and Phase 2 – to determine whether any aspects were relevant or warranted further discussion. This approach helped streamline the process and ensure the work filled the gaps while remaining on track.

The WG also emphasized the importance of maintaining a limited scope, noting that addressing the single and core issue – examining a possibility for simultaneous delegation of ASCII gTLDs and LD gTLDs – within a defined scope was both necessary and appropriate. Any issues not covered during this PDP could be addressed through future work.

2.2 Early Community Input

In accordance with the GNSO PDP requirements,[5] the WG sought written input on the Charter topics from each SO/AC , and GNSO SG/C. The input received was incorporated into the WG's deliberations as each topic was discussed. All groups that provided written input had representative members or appointed subject matter experts in the WG, positioning them well to respond to clarifying questions from others as the written input was reviewed and considered.

2.3 Methodology for Deliberations

The WG began its deliberations on 08 March 2025 during ICANN82 in Seattle, and those deliberations continued primarily through conference calls scheduled weekly and regular email exchanges on its mailing list. Other public sessions held in person took place during ICANN83,

[5] The relevant requirements are stipulated under Section 10 of the PDP Manual at https://gnso.icann.org/sites/default/files/file/field-file-attach/annex-2-pdp-manual-21may26-en.pdf#page=6

ICANN84, ICANN85, and ICANN86. These public sessions provided an opportunity for the broader community to contribute to the WG's deliberations and provide input on the Charter topics being discussed.

Throughout its deliberations, the WG emphasized the importance of maintaining a limited scope, devoting significant time to deliberating and solving the single issue of a possible simultaneous delegation of ASCII gTLDs and LD gTLDs. Following the Public Comment for the Initial Report, the definition of diacritics was adjusted, expanding the list of eligible characters to a limited extent. However, the WG continued to keep its scope of work narrowly focused by drawing from a list of characters per the Unicode Table.[6] This helped the WG set an objective standard of scope while ensuring that any issues not covered during this PDP could be addressed in future work.

All of the WG's work is documented on its wiki workspace, including its members, mailing list, meetings, meeting notes, draft working documents, background materials, Early Input received from the ICANN community, as well as Public Comment submissions and the resulting Review Tool that contains the WG's deliberation summaries.

Overall, the WG employed both a methodical and an iterative approach to develop its final outputs. The WG progressed through the Charter questions by topic, following the sequence established in the project plan, beginning with a high-level overview and contextual background provided by the leadership team, GNSO Support Staff, and ICANN org liaisons to inform its review of previously established work and policies – i.e., ccTLD Fast Track Process, ccPDP4, SubPro Final Report, and EPDP-IDNs Phase 1 and Phase 2.

Iteratively, the WG, then, reviewed the established materials and framework, deliberated on the issues, and worked with the leadership team and Staff to draft responses to the Charter questions, repeatedly reviewing and refining to confirm the text until each section was considered stable and ready for inclusion in the final output. Where appropriate, members also consulted with their respective groups and provided additional feedback, helping to ensure that the final outputs were coherent, comprehensive, and consistent.

Following the Public Comment Proceeding for the Initial Report on 12 January 2026, the WG reviewed community and ICANN org input using the Public Comment Review Tool developed by the Policy Support Staff.[7] During this stage, the WG recognized key community and ICANN org concerns, including defining the eligible characters, which impacted the definition of the ASCII/LD gTLD Set and the ASCII/LD Domain Set and making the broader adjustments that were necessary to align with the conservatism principle. Accordingly, the WG incorporated comments, as appropriate, through the same iterative and deliberative process used to develop preliminary work. Throughout the deliberations, when discussions stalled or consensus became difficult,

[6] This is not intended to serve as an authoritative source or an exhaustive list of characters, but rather as a basis for defining the scope for this PDP. More details on this determination can be found in "Section 4. Final Outputs."

[7] All relevant materials for the Initial Report Public Comment Proceeding can be found on the dedicated wiki page at https://icann-community.atlassian.net/wiki/spaces/gnsolsdpdp/pages/806649860/Public+Comment+for+Initial+Report

informal polls were occasionally used during the WG meetings to gauge the "temperature of the room" and advance discussions. For those WG members who were less comfortable speaking on calls, the leadership team encouraged additional feedback via the mailing list and written comments on WG documents, ensuring that all members had ample opportunities to make meaningful contributions.

2.4 Use of Background and Working Documents

The WG used a series of background documents – mainly the previously established bodies of work and policy – organized per Charter topic, to support its deliberations. These existing and relevant documents provided a basis for discussion of each Charter question. Archives of the background documents are maintained on the WG wiki.[8]

The WG produced various working documents and draft outputs as they tackled each Charter question and the pertaining prior work, capturing WG deliberations and analyses per topic. These documents were updated on an ongoing basis, moving the discussions along per topic.[9] The discussion summaries ultimately captured draft responses to Charter questions, the WG agreements, and draft recommendations, which developed into final recommendations and their rationales.

2.5 Data and Metrics

The Root Zone Label Generation Rules (RZ-LGR) for Latin Script, Unicode Charts,[10] previously established work and policies on IDNs – ccTLD Fast Track Process, ccPDP4, SubPro Final Report, and EPDP-IDNs Phase 1 and Phase 2 – served as the WG's primary resource for data and metrics. In the course of its deliberations, the WG identified additional data that would be valuable to support its work – such as the Unicode Table, listing the characters determined within and out of scope,[11] and helpful materials to understand the New gTLD Program: 2026 Round,[12] including the Applicant Guidebook (AGB)[13] which contains helpful information such as the String Similarity Review process and the Applicant Journey. Where ICANN org was in a position to collect and analyze relevant data, subject matter experts from ICANN org assisted the LD PDP WG with these tasks.

[8] Background documents listed in the order of Charter questions can be found on the dedicated wiki page at https://icann-community.atlassian.net/wiki/x/2wPVBg.
[9] Working documents produced intentionally for the analysis and inclusion of the WG's deliberations, in response to the Charter questions can be found on the dedicated wiki page at https://icann-community.atlassian.net/wiki/x/BIDqJw.
[10] Various Unicode Charts that the WG referred to during the course of deliberations are archived here on wiki: https://icann-community.atlassian.net/wiki/x/2wPVBg
[11] Generated by Mark Datysgeld, Vice Chair of LD PDP, for the use of the WG to determine the scope of work and the list of eligible characters.
[12] Refer to the New gTLD Program: 2026 Round dedicated page for relevant information and various resources at https://newgtldprogram.icann.org/en
[13] This represents the latest and final version at this time (i.e., 24 April 2026). The AGB for the New gTLD Program: 2026 Round was originally published on 16 December 2025.

Any additional data provided by the WG members or ICANN org in response to these requests is all available on the WG's wiki.

2.6 ICANN Org and Board Interaction

To help support a smooth transition from policy development to eventual implementation of GNSO Council-adopted and ICANN Board-approved recommendations, the WG has been supported by early and ongoing engagement with ICANN org subject matter experts. Liaisons from ICANN org's Global Domains and Strategy (GDS), IDN and Universal Acceptance (UA) Program, and GDS Technical Services (GTS) regularly attended WG calls, providing input and responding to questions where it was possible to do so in real time. The liaisons acted as a conduit for WG questions to ICANN org that required additional research or input.

The LD PDP WG also received substantial support from the subject matter experts of both the Public Responsibility Team and Global Stakeholder Engagement (GSE) Function at ICANN org, when conducting the Global Public Interest (GPI) and Human Rights (HR) Impact Analyses. Since the WG had taken on the role of piloting the integration of this work, a significant amount of collaboration, guidance, and input was required throughout the process.

In addition, the ICANN Board appointed a liaison to the WG who also regularly attended the WG calls to act as a conduit between the Board and the LD PDP WG.

2.7 Accountability to the GNSO Council

The WG reported its progress to the GNSO Council through a monthly update to the "Project List" – a compilation of GNSO's active projects, standing committees, and other work organized by the flow of the PDP – in which the LD PDP WG's updates were included and refreshed each month. An archive of these lists is available on the wiki. The GNSO Council liaison to the WG served as an additional point of connection between the Council and the WG.

Moreover, the leadership team of the LD PDP has been invited to speak to the GNSO Council through GNSO Council Webinars prior to ICANN Public Meetings and/or when it was timely to share important information or key milestones.

3 Glossary

The table below lists the key terms and phrases that are used throughout this Final Report, covering topics related to the LD PDP. The explanations of their meanings are developed based on the LD PDP WG's understanding of the existing bodies of work[14] and the WG's use of the terms in the context of the LD PDP WG's Charter question deliberations. Additional notes are included to explain the common usage of certain terms and phrases in this Final Report.

The WG appreciates that some readers may consider the meaning of the terms as reflected in this glossary to be imprecise from a technical perspective. The WG understands that this may be the case and it is for this reason the WG has not provided a definition, but rather the 'meaning' of the term as used and commonly understood by the WG.

The terms in this glossary are organized in alphabetical order. Some terms are cross-referenced in multiple places within this glossary and they are *italicized* to facilitate reference.

Term	Meaning	Additional Notes on Usage
Activate / Activation / Activated	Activate refers to the activation or enablement of a *domain name*. After activation, a *domain name* is visible in the Domain Name System (DNS) and activated for use (e.g., its associated website and/or email services are active).[15] Activation of a *domain name* does not necessarily require *registration*.	The meaning remains consistent with the *EPDP-IDNs*. Note the distinction between "activate" and "*register.*" Depending on the registry model, a *gTLD registry operator* may use "*EPP* Create" (i.e., register) to activate an *ASCII/LD domain name* as an independent registration, but may also use other methods (e.g., "*EPP* Update" to create a "child domain name" as an attribute to the *source domain name*) for activating a *variant domain name*. Its associated adjective "*activated*" is sometimes used interchangeably with "active."

[14] As introduced in Sections 1 and 2, the existing bodies of work includes the ccNSO Fast Track Process, ccPDP4 Final Report, SubPro Final Report, and EPDP-IDNs P1 & P2 Final Reports, as well as ICANN's existing Consensus Policies – all of which the WG reviewed and deliberated on through Charter Questions 2-4.

[15] The original definition of "activated" can be found in RFC 7940 at https://datatracker.ietf.org/doc/html/rfc7940#section-7.3

Term	Meaning	Additional Notes on Usage
Allocatable	This is a valid *domain name* derived from a *source domain name* that is eligible for allocation as part of an *ASCII/LD Domain Set*. An *allocatable variant domain name* should be reserved for use by the same registrant of the *source domain name* but not automatically allocated for use.[16] At the second-level, the allocatable status is determined by the *IDN Table* managed by the *gTLD registry operator* of the given gTLD.	The meaning remains consistent with the *EPDP-IDNs*. It usually appears in the phrase, "*allocatable domain name(s)* of an *ASCII/LD Domain Set.*" The other possible disposition value is "blocked."
Allocation	Allocation typically indicates the start of the d*omain name lifecycle* and refers to the administrative association or assignment of a *domain name* to the entity who has requested it.[17] When a domain enters the "Redemption" or "Pending Deletion" stage of the *domain name lifecycle,* it is regarded as "deactivated" but still allocated.	The meaning remains consistent with the *EPDP-IDNs*. This term is frequently mentioned throughout the Final Report, as it is associated with the *"same entity"* principle; Once a *domain name* has been *allocated*, it must remain linked to the same *registrant* of the *source domain name* and at the same sponsoring *registrar*. This should be considered a persistent requirement in all stages of its *domain name lifecycle*. It does not matter whether the *domain name* is *activated*. As long as it is still allocated, the *"same entity"* principle must be upheld.
American Standard Code for Information Interchange (ASCII)	A common character-encoding standard that computers use to store, transmit, and print English (or "Latin") text.	The meaning remains consistent with the *EPDP-IDNs*. As the central question of this *PDP* is whether an ASCII gTLD and its *corresponding* LD gTLD can be

[16] This explanation referenced the definition of "allocatable" in the RFC 7940 at https://www.rfc-editor.org/rfc/rfc7940.html#section-7.2.1

[17] This explanation is derived from the definition of "allocation" and "allocated" in the IDN Implementation Guidelines version 4.0. See Annex B at https://www.icann.org/en/system/files/files/idn-guidelines-22sep22-en.pdf#page=7

Term	Meaning	Additional Notes on Usage
	After many decades of use, the acronym ASCII (pronounced AS-KEE) is more well-known and more frequently used than its full name (American Standard Code for Information Interchange).[18]	simultaneously delegated, this term forms the core focus of this report and appears extensively throughout.
Applicant Guidebook (AGB)	In the New Generic Top-Level Domain Program (New gTLD Program), the Applicant Guidebook (AGB) is the document that describes the requirements of the new gTLD application and evaluation processes. The AGB was adopted by the ICANN Board on 30 October 2025 during its Board Meeting in ICANN84 in Dublin and was published on 16 December 2025 for the New gTLD Program: 2026 Round.[19] The current version represents the latest and final version at this time (i.e., 24 April 2026). The AGB for the 2012 New gTLD Program was published on 4 June 2012. It is often referred to as the "2012 Applicant Guidebook."[20]	This term appears throughout the report, as the rules set forth in this Final Report are intended to guide applicants seeking to apply for an *ASCII/LD gTLD Set* in future rounds; the AGB is a key vehicle for operationalizing those recommendations. Though these recommendations will not be included in the current version of the AGB for the 2026 Round, they will be incorporated into future versions of the AGB for future rounds.
ASCII/Latin Diacritic gTLD Set (ASCII/LD gTLD Set) *(*Note: This term is intentionally placed*	An ASCII gTLD and its *corresponding* LD gTLD(s) that constitute an ASCII/LD gTLD Set for the purpose of application, contractual requirements,	This term is first introduced in Final Recommendation 1, which outlines the requirements for the ASCII/LD gTLD Sets. The WG considered it essential to

[18] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/ascii-en

[19] See the current – latest and final – version of the AGB for the 2026 Round at https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf. The HTML version can be found at https://newgtldprogram-2026-agb.icann.org/en/1-applicant-guidebook-version-history.html

[20] Download the 2012 AGB from https://newgtlds.icann.org/en/applicants/agb

Term	Meaning	Additional Notes on Usage
before the next term – thus out of alphabetical order – as it provides the meaning and more context necessary to better understand the ASCII/LD Domain Set in the next row.)	allocation, and delegation. In the *LD PDP*, this term is introduced to define all the strings that qualify as a set and are, therefore, granted an exception, allowing them to be submitted, delegated, and operated together by the same *gTLD registry operator* simultaneously. The gTLDs within the set are sometimes referred to as "gTLDs that constitute an ASCII/LD gTLD Set," "ASCII gTLD and LD gTLD(s) that constitute the set," "labels within the ASCII/LD gTLD Set," "labels in the set," etc.	establish this term at the outset and later refine it in light of the Public Comment period, as it serves as the foundation for the *LD PDP* and addressing Charter Question 1 – under what circumstances a base ASCII gTLD and the LD version of the gTLD can be simultaneously delegated and what measures should be taken in order to mitigate potential end-user confusion? Examples of this set include: - .cafe and .café - .test, .tést, and .tèst - .leffe, .leffé, .lèffe, and .lëffê For the avoidance of doubt, this term only applies to top-level strings. This is in contrast to the *ASCII/LD Domain Set*, which encompasses and addresses second-level labels and their management, as set out in Final Recommendations 41 and 42. The definition and management of ASCII/LD gTLD Sets can be compared to *EPDP-IDNs' Variant* gTLD Sets.
ASCII/Latin Diacritic Domain Set (ASCII/LD Domain Set)	This set builds on the *ASCII/LD gTLD Set* at the top-level and should encompass all second-level domains which are required to belong to the same entity based on the policy of this PDP.	This term is first introduced and established through Final Recommendation 41, and the criteria and requirements applicable to the second-level LGRs for the *gTLD registry operators* that manage the

Term	Meaning	Additional Notes on Usage
		ASCII/LD gTLD Sets are outlined in Final Recommendation 42. Similar to Final Recommendation 1, the WG considered it essential to establish this term at the outset – and later refine it following the Public Comment period – to provide clarity of the second-level labels and ensure a common understanding of the *allocatable domain names* of an *ASCII/LD Domain Set* throughout the report. Examples of this set include: - saß.café, sass.café, sáss.café, and sáß.café - saß.café, sass.café, sáss.café, sáß.café, sass.cafe, and sáss.cafe - miß.café, míß.café, mïß.café, mı̈ß.café, miss.café, míss.café, mïss.café, and mı̈ss.café - miß.café, míß.café, mïß.café, mı̈ß.café, miss.café, míss.café, mïss.café, mı̈ss.café, miss.cafe, míss.cafe, mïss.cafe, mı̈ss.cafe, and mıss.cafe The definition and management of ASCII/LD Domain Sets can be compared to *EPDP-IDNs' Variant Domain Sets*.
Blocked	This is a valid *variant domain*	The meaning remains consistent

Term	Meaning	Additional Notes on Usage
	name derived from a *source domain name* that is ineligible for *allocation* under a given gTLD. A blocked *variant domain name* should be blocked from *allocation*. At the second-level, the blocked status is determined by the *IDN Table* managed by the *gTLD registry operator* of the given gTLD.	with the *EPDP-IDNs*. The other possible *disposition value* is *"allocatable."*
Category 1 Safeguard	Specific safeguards that would apply to a broad category of strings related to "consumer protection, sensitive strings, and regulated markets." Initially, the Governmental Advisory Committee (GAC) advised the ICANN Board that "strings that are linked to regulated or professional sectors should operate in a way that is consistent with applicable laws." Accordingly, each Category 1 string requires one of the following three (3) levels of safeguards: 1) Regulated Sectors/Open Entry Requirements in Multiple Jurisdictions; 2) Highly Regulated Sectors/Closed Entry Requirements in Multiple Jurisdictions; and 3) Special Safeguards Required.	This term is captured in the current *AGB* and is discussed in Final Recommendation 29 of this report. The gTLDs within the *ASCII/LD gTLD Set* must be bound by the same restrictions subject to Category 1 Safeguards.
ccPDP4	The abbreviation of the Country Code Names Supporting Organization (ccNSO) Policy Development Process 4 on the (de-)Selection of *IDN* ccTLD Strings.	The meaning remains consistent with the *EPDP-IDNs*. The *LD PDP WG* referenced *ccPDP4* when addressing Charter Question 2 of this *PDP* and assessing if elements from this work were transferable to *LD PDP*. See "Section 4.2.1. Charter Question 2" of this Final Report.

Term	Meaning	Additional Notes on Usage
Conservatism/ Conservatism Principle	Adopting a more conservative approach in the gTLD policy development as a way to limit any potential security and stability risks associated with *domain name* delegation.	The meaning remains consistent with the *EPDP-IDNs* where it was used to describe the underlying principles for *variant label* delegation agreed upon by the *EPDP-IDNs* Team. During the Public Comment period, ICANN org emphasized the importance of the *LD PDP* applying a conservative approach and requested that the WG revisit and refine the policy outputs accordingly. In response to this request, the *LD PDP* WG refined the policy outputs with the conservatism principle as a guiding consideration. Noting that this *PDP* is an exception process, whereas *EPDP-IDNs* sought to promote *IDN* adoption, the conservatism principle for the *LD PDP* sought to maintain its exception status while preserving the stability, security, and predictability of the established framework (i.e., management of *IDN variant* TLDs) so that any uncertainty, confusion, and degraded experience could be avoided. Final Recommendations 1, 6, 7, 15, 16, 41, 42, and Implementation Guidance 44 are direct results of this approach, but the WG tried to achieve conservatism broadly throughout its deliberations and

Term	Meaning	Additional Notes on Usage
		the development of the Final Report.
Corresponding	This term clarifies how an *ASCII* gTLD and its matching LD gTLD(s) that may be visually confusingly similar, can be linked as they constitute an *ASCII/LD gTLD Set*. Every LD gTLD has exactly one corresponding *ASCII* gTLD. The *ASCII* gTLD can have one or more corresponding LD gTLDs.	This term is extensively used throughout the report to describe an *ASCII* gTLD and its matching LD gTLD(s) that constitute the *ASCII/LD gTLD Set*.
Domain Name	A unique string of letters – including base letters and/or accented characters – consisting of two or more levels (for example, john.smith.name) maintained in a registry database.	The meaning is derived from the current *AGB* and has been adapted to enhance clarity.
Domain Name Lifecycle	The domain name lifecycle is generally summarized into five (5) main stages, which are: 1) available, 2) *active*, 3) expiration, 4) redemption, and 5) pending deletion. A *domain name* does not necessarily go through all five main stages of the domain name lifecycle.	The meaning remains consistent with the *EPDP-IDNs*. Here in *LD PDP*, this term is discussed in Final Recommendation 49.
EBERO	Emergency Back-End Registry Operator	Refer to Final Recommendation 25.
EPDP	The acronym of Expedited Policy Development Process. It differs from the *Policy Development Process (PDP),* mainly in that an Issue Report and the associated Public Comment process steps are not needed in the process. The Expedited Policy Development Process itself is described in Annex 4 of the GNSO Operating	This term usually appears in the phrases “EPDP-IDNs.”

Term	Meaning	Additional Notes on Usage
	Procedures.[21]	
Exempted	A provision in which an immediate previous rule continues to apply to some existing situations while a new rule will apply to all future cases. This is a condition that should be resolved in time.	This term was mostly considered by the *LD PDP* WG in Final Recommendations 6 and 7 for the top-level and Topics 6-8 for the second-level discussions. "Exempted" is a replacement for the term "grandfathered" and its variations that had been used in the *EPDP-IDNs* Phase 2 Initial Report. This term was changed by the E*PDP-IDNs* Team during Phase 2 Final Report in response to concerns raised by ICANN org during the Public Comment period.[22] In the context of *LD PDP*, "exempted" means that there will be no change to the contractual and *allocation* status of existing TLDs and *domain names* that do not conform to the "*same entity*" principle, as recommended by the *LD PDP* WG. The requirement of having the same *registrant* and the same sponsoring *registrar* will not be applied retroactively. Appropriately, the exempted TLDs and *domain names* are also excluded from the additional requirements relating to the *"same entity"* principle. This also implies that the "exemption period" will end when one *registrant* and one sponsoring *registrar* remain for the *ASCII/LD*

[21] See "Annex 4" of the GNSO Operating Procedure at https://gnso.icann.org/sites/default/files/file/field-file-attach/annex-4-epdp-manual-15mar23-en.pdf
[22] See the Phase 2 Initial Report Public Comment submissions and Review Tool on wiki at https://community.icann.org/display/epdpidn/Phase+2+Initial+Report+-+Public+Comment

Term	Meaning	Additional Notes on Usage
		Domain Set, which would effectively allow for further *allocation*.
Extensible Provisioning Protocol (EPP) Domain Status Code	The EPP domain status code, also called *domain name* status code, indicates the status of a *domain name*. Every domain has at least one status code, but it can also have more than one. There are 17 standardized EPP domain status codes, plus the Registry Grace period status code. See the EPP Status Codes webpage on icann.org for more information.[23]	This term is first introduced in the report through Final Recommendation 21.
Full Backward Compatibility	A state where new rules and policy do not break or alter the previously established versions or rules. All prior functionalities continue to work seamlessly under the "full backward compatibility" principle.	This term is used throughout Final Recommendations 34-35 in the Final Report. The *LGR* Procedure requires the Generation Panels (GPs) and the Integration Panel (IP) to adhere to the stability principle and to make best efforts to retain full backward compatibility with delegated gTLDs. In the context of *LD PDP*, future GPs will need to be mindful of this issue where existing cases may conflict with the newly updated rules, and resolving such cases may require new solutions to maintain full backward compatibility. In this case, the issue extends to all gTLDs and is not unique to *LD PDP*. In essence, future updates to the RZ-LGR should aim to maintain full backward

[23] Learn more here at https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en

Term	Meaning	Additional Notes on Usage
		compatibility with existing delegated gTLDs and their variant *labels* as well as *allocated* and delegated *ASCII/LD gTLD Set* strings in order to preserve the root zone stability.
gTLD Registry Operator	The organization that maintains the master database (registry) of all *domain names* registered in a particular TLD. gTLD registry operators receive requests from *registrars* to add, delete, or modify *domain names*, and they make the requested changes in the registry.	The meaning remains consistent with the *EPDP-IDNs*. gTLD registry operator is a relatively new concept, introduced via *EPDP-IDNs* Phase 2 to avoid any confusion regarding which party is impacted by the policy.
Harmonization	The process of making different situations compatible and consistent with one another.	The meaning remains consistent with the *EPDP-IDNs*. This topic is introduced in Topic 7 of this report and in the context of *LD PDP*, harmonization is also critical to ensure that all *IDN Tables* associated with a given gTLD generate a consistent *Variant Domain Set* for any *source domain name* across all TLDs in an *ASCII/LD gTLD Set*. This activity is intended to prevent inconsistencies.
Internationalized Domain Name (IDN)	A *domain name* in which one or more of its *labels* contain characters other than *ASCII* letters, digits, or hyphens. Because IDNs support the use of Unicode characters, they can include characters from local languages and scripts. For example, 실례.테스트, is a *domain name* composed entirely of Hangul characters. Another example is 你好.com, which is a *domain name* composed of strings from two	The meaning is derived from the current *AGB* and has been adapted to enhance understanding.

Term	Meaning	Additional Notes on Usage
	different scripts – Chinese characters with a Latin .com extension.	
IDN Table	A specification that defines the permitted characters and rules for combining characters to form *labels* in the languages and scripts applicable to the second-level under a gTLD. The terms *IDN table* and Label Generation Rules are synonymous.[24] *IDN Tables* represent a *gTLD registry operator's* second-level rules for its respective gTLD(s) regarding IDN second-level *labels*.	The meaning remains consistent with the *EPDP-IDNs*. Final Recommendation 47 of this Final Report deals with this concept. Regarding *IDN Table harmonization, gTLD registry operators* develop their own *IDN Tables* and submit them to ICANN org for review for the consideration of any significant security, stability, and competition issues.
Label	The segments that are separated by dot characters in a *domain name*. For example, the *domain name,* gnso.icann.org consists of three labels: gnso, icann, and org.[25]	The meaning remains consistent with the *EPDP-IDNs*. This term is also interchangeable with "*string*," particularly in the top-level context. For *LD PDP*, the WG agreed to update all "label" to *"string"* with regards to the top-level following a suggestion by ICANN org. "Label" is maintained for the second-level portion of this report (Topics 6-8).
LD PDP	The abbreviated form used consistently throughout the process and in this Final Report for "Latin Script Diacritics Policy Development Process." This acronym was determined by the LD PDP WG during its Kick-off Meeting at ICANN82.	The Working Group that is involved in this process and develops the final policy outputs is referred to as the LD PDP WG.
PDP	The abbreviation of Policy	N/A

[24] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/internationalized-domain-name-table-en
[25] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/label-en

Term	Meaning	Additional Notes on Usage
	Development Process. The Policy Development Process itself is described in Annex A of the ICANN Bylaws.[26]	
Register / Registration / Registered	*Domain name* registration is the process of creating a *domain name*, typically via the "*EPP* Create" command, and acquiring it for a certain period of time. The registration of a *domain name* indicates a billable transaction. A registered *domain name* exists in the Shared Registry System (SRS) and is visible in the WHOIS[27]. However, it does not necessarily mean a registered *domain name* must be *activated* for use. For example, defensive registration is a widely accepted practice.	The meaning remains consistent with the *EPDP-IDNs*. Note the distinction between "*activate*" and "*register.*"
Registrant	An individual or entity who registers a *domain name*.	The meaning remains consistent with the *EPDP-IDNs*. Registrant is one of the key parties for fulfilling the "*same entity*" principle and related requirements for the second-level management. This term frequently appears throughout the report.
Registrar	An organization through which individuals and entities (*registrants*) register *domain names*.	The meaning remains consistent with the *EPDP-IDNs*. Registrar is another key party for fulfilling the "*same entity*" principle and related requirements for the second-level management. The term "sponsoring registrar" also frequently appears, which refers to the registrar authorized by the *registrant* to register and

[26] See Annex A of ICANN Bylaws at https://www.icann.org/resources/pages/governance/bylaws-en/#annexA

[27] The Registration Data Access Protocol (RDAP) is intended to replace the WHOIS protocol for all gTLDs in 2025, at which point support for WHOIS will be dropped.

Term	Meaning	Additional Notes on Usage
		manage its *domain name*. A registrar that has entered into a Registrar Accreditation Agreement with ICANN is referred to as an ICANN-accredited registrar.[28]
Rights Protection Mechanism (RPM)	A mechanism that helps safeguard intellectual property rights in the Domain Name System. RPMs include the *Uniform Domain Name Dispute Resolution Policy (UDRP)*, *Uniform Rapid Suspension (URS)*, and *Trademark Post-Delegation Dispute Resolution Procedure (Trademark PDDRP)*.	The meaning remains consistent with the *EPDP-IDNs*. This topic was extensively considered by the *LD PDP* WG in the context of Topic 8.
Root Zone Label Generation Rules (RZ-LGR)	A set of rules that determine valid top-level domain labels, their *variant* labels, and disposition values of the *variant* labels. The RZ-LGR includes a list of permissible code points and variant code point mappings (if any) along with a set of rules that act on these code points and mappings.[29] For the latest version of the RZ-LGR, visit the Root Zone Label Generation Rules webpage.[30]	The meaning remains consistent with the *EPDP-IDNs*. This topic is more relevant for *EPDP-IDNs*, especially with regard to Phase 1 deliberations, focusing on the top-level *variant* management. However, it is also extensively discussed within *LD PDP*; this term was considered from the outset when determining the scope, given that the work is limited to the examination of non-*variant ASCII* and LD gTLD cases per the WG Charter.
Same Entity Principle	A principle where the same *gTLD registry operator* manages and operates both the *ASCII* gTLD and its *corresponding* LD gTLD(s). At the *domain name* level, all *allocatable domain names* of an *ASCII/LD Domain Set* must be *allocated* or withheld for possible	The meaning remains consistent with the *EPDP-IDNs*. The *"same entity"* principle is a cornerstone requirement for the *LD PDP* policy too. The goal of the *"same entity"* principle is to minimize user

[28] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/registrar-en
[29] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/root-zone-label-generation-rules-en
[30] Learn more: https://www.icann.org/resources/pages/root-zone-lgr-2015-06-21-en

Term	Meaning	Additional Notes on Usage
	allocation only to the same *registrant*. The goal of this principle is to minimize user confusion and security risks associated with the *domain names*.	confusion and security risks associated with *the ASCII/LD gTLD Sets and the ASCII/LD Domain Sets.* This would help mitigate potential user confusion in the event of simultaneous delegation.
Source Domain Name	A source domain name is a registered *domain name* under a given gTLD that determines the composition of the *Variant Domain Set* under that gTLD and its delegated gTLD *variant label(s)*, if any. The source domain name also determines the *disposition values* of *variant domain names* under a given gTLD from the *Variant Domain Set*.	The meaning remains consistent with the *EPDP-IDNs*. The source domain name must be identified between the *registrant* and the sponsoring *registrar* as a joint responsibility pursuant to Final Recommendation 48. Here, the source domain name can be different per TLD, in accordance with the *ASCII/LD Domain Set* as defined in Final Recommendation 41. This solution – allowing different source domain names per TLD – is consistent with *EPDP-IDNs* and the *source domain name* must originate from the *ASCII/LD Domain Set*.
String	The string of characters comprising an applied-for gTLD or its *variant* string.	The meaning is derived from the current *AGB*. For *LD PDP*, the WG agreed to update all "*label*" to "string" with regards to the top-level following a suggestion by ICANN org. "*Label*" is maintained for the second-level portion of this report (Topics 6-8).
Subsequent Procedures (SubPro)	An abbreviation of the New gTLD Subsequent Procedures *PDP.* The SubPro *PDP* WG was tasked to consider when and how to expand the number of generic top-level domains. The WG evaluated the 2012 application round to identify	The meaning remains consistent with the *EPDP-IDNs*. The *LD PDP WG* referenced SubPro when addressing Charter Question 3 of this *PDP* and assessing if elements from this work were transferable to *LD PDP*. See

Term	Meaning	Additional Notes on Usage
	areas where additional policy development might be needed before launching another application round. It completed its deliberations and submitted its Final Report to the GNSO Council on 18 February 2021.[31] The Final Report includes hundreds of Outputs on 42 topics related to the future of the New gTLD Program. Topic 25 of the Final Report focuses on *IDNs*. Most of the Topic 25 Outputs are pertaining to the definition and *variant* management mechanism of future gTLDs.	"Section 4.1.2: Charter Question 3" of this Final Report.
TM-PDDRP	Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP). A formal procedure in the New gTLD Program that generally addresses a *gTLD registry operator*'s complicity in an alleged trademark infringement of a new gTLD. Disputes resolved by a *TM-PDDRP* are administered by Dispute Resolution Service Providers approved by ICANN. Complainants are required to take specific steps to address their issues before filing a formal complaint. An expert panel determines whether a *gTLD registry operator* is liable and recommends remedies to ICANN.[32]	This term is referenced in Final Recommendation 26 of this Final Report.

[31] The SubPro PDP Final Report can be found at https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf

[32] This explanation is reproduced verbatim from the ICANN Acronyms and Terms webpage: https://www.icann.org/en/icann-acronyms-and-terms/trademark-post-delegation-dispute-resolution-procedure-en

Term	Meaning	Additional Notes on Usage
Uniform Domain Name Dispute Resolution Policy UDRP (UDRP)	A policy for resolving disputes arising from alleged abusive registrations of *domain names* (for example, cybersquatting), allowing expedited administrative proceedings that a trademark rights holder initiates by filing a complaint with an approved dispute resolution service provider.	The meaning is taken from the current *AGB*. This is listed as one of ICANN's existing Consensus Policies.[33] Here in *LD PDP* Final Report, this term is referenced in Final Recommendation 51, whereby the WG examined further through Charter Question 4.
Uniform Rapid Suspension (URS)	An expedited administrative procedure that rights holders can initiate for certain types of domain name disputes. The URS procedure is a tool for quickly addressing clear-cut cases of trademark infringement.	The meaning is taken from the current *AGB*. Here in *LD PDP* Final Report, this term is referenced in Implementation Guidance 52.
Variant gTLD	Variant gTLDs are *strings* which are considered "same" by the community as defined in the *RZ-LGR*.[34] Here in *LD PDP* and throughout the Final Report, the "variants" refer to "*IDN* variants."	The meaning is derived from the current *AGB* with the addition of "gTLD" to distinguish this entry and meaning from the following entry, *Variant Domain Name*, for *LD PDP*. This term was considered from the outset when determining the scope, given that the work is limited to the examination of non-*variant ASCII* and LD gTLD cases per the WG Charter. This was further examined in greater detail by the *LD PDP WG* in the context of the requirements for the set at the second-level and *variant* management through Topics 6-8.

[33] See the list of ICANN's existing Consensus Policies at https://www.icann.org/en/contracted-parties/consensus-policies

[34] See the glossary entry of "Variant String" in the AGB for the full definition and further details: https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf#page=434

Term	Meaning	Additional Notes on Usage
Variant Domain Name	A variant domain name is a *domain name* derived from the *source domain name*. It represents the combination of *variant labels* of the *source domain name* at both the second- and top-levels. Its second-level *label* is calculated as a *variant* of the *source domain name*'s second-level *label* based on a given *IDN Table* of a given gTLD. Its top-level *string* can be the *source domain name's* gTLD or its delegated gTLD *variant string(s)*, if any. A variant domain name under a given gTLD may have the *disposition value* of either *allocatable* or *blocked*, as calculated by a given *IDN Table* of that gTLD.	The meaning remains consistent with the *EPDP-IDNs*. The *LD PDP* WG considered this term extensively through Topics 6-8 on second-level management rules.
Variant Domain Set	The set of *variant domain names* that is derived from and also includes the *source domain name*. The Variant Domain Set consists of *variant label* sets at both the second- and top-levels. The "set" at the second-level is enumerated from the second-level *label* of the *source domain name*, using the *IDN Tables* of the given gTLD. The "set" at the top-level is limited to a given gTLD and its delegated gTLD *variant string(s)*, if any. To confirm, the composition of the second-level *variant label* set is the same under the given gTLD and its delegated gTLD *variant string(s)*. In short, the Variant Domain Set consists of: *source domain name* +	The meaning remains consistent with the *EPDP-IDNs*. Establishing rules and guidance on this set was key for *EPDP-IDNs* as it relates to the *IDN Table harmonization* requirement, *"same entity"* principle, and the lifecycle management of *variant domain names*. The *LD PDP* WG considered this term extensively in Topics 6-8, which address second-level management rules. In particular, the *ASCII/LD gTLD Set* and the *Variant Domain Set* were analyzed and compared in depth during the stress testing of edge cases, involving scenarios in which both sets might potentially be activated

Term	Meaning	Additional Notes on Usage
	variant domain(s) across a given gTLD and all of its delegated *variant* gTLDs.	simultaneously.[35]

[35] See details in the rationale for Final Recommendation 1 and "Annex C – Stress Test: Edge Case Studies" of this Final Report.

4 Working Group Final Outputs

The WG was chartered to examine the exceptional circumstance in which an ASCII gTLD and its LD gTLD version(s) that are non-variants of each other could be simultaneously delegated, despite the gTLD strings having a non-negligible chance of being determined as confusingly similar. On that basis, the WG was tasked with developing policy recommendations for the GNSO Council that identified the conditions and measures under which such cases could be permitted.[36]

Acknowledging the unique nature of this PDP – that these cases would be operated as an exception to the current procedures guided in the 2026 Round (i.e., String Similarity Evaluation), as well as future rounds, which currently relies on the RZ-LGR for variant management – the WG focused on adhering to its Charter and maintaining a narrow scope. The WG also agreed that it was important to reference previous bodies of work related to IDNs policy – including the ccTLD Fast Track Process, ccPDP4 Final Report, SubPro PDP Final Report, and the EPDP-IDNs Phase 1 and Phase 2 – to determine whether any aspects were relevant or warranted further discussion. As a result, the WG decided to mirror the policy derived from EPDP-IDNs – both phases – updating the language to the relevant LD context and excluding any provisions that were not applicable.

The Initial Report, containing 54 preliminary recommendations and implementation guidance, was published for Public Comment on 12 January 2026. During the Public Comment Review period, there were a number of issues raised that required further consideration by the LD PDP WG, which are now reflected in the Final Report as a change from the Initial Report. These concerned: 1) requirements for the set at both the top- and second-levels, including character eligibility and the permissible scope of the set; 2) conservatism principle for the LD PDP, noting that it is an exception process; and 3) fee-related policy, recognizing that it shall remain within ICANN org's operational discretion. Revisiting these issues had implications across multiple topics within this section, resulting in corresponding revisions related to application and evaluation requirements, contractual requirements, and delegation and removal requirements.

Consequently, the LD PDP WG developed 57 policy Outputs – including 45 final recommendations and 12 implementation guidance – for the GNSO Council's consideration. This report presents the level of consensus that the LD PDP WG has achieved for each final recommendation and implementation guidance. In short, all these policy outputs received "full consensus" support from the LD PDP WG. For more details, please see the "Annex B: Consensus Designation" section of this Final Report.

[36] This issue was identified in the Final Issue Report on a Policy Development Process for Latin Script Diacritics.

To assist the reader, the structure of the subsections that organize the Charter questions and their corresponding policy outputs is as follows:

- Section 4.1: Charter Questions with Policy Outputs[37]
- Section 4.2: Charter Questions with No Policy Outputs

Charter Question 1 is central to the issue that the LD PDP WG is seeking to resolve – establishing policy requirements and the implementation mechanisms that are currently absent for the LD gTLDs to simultaneously exist with its corresponding ASCII gTLD that have a non-variant relationship. The WG's responses to this question form the basis of the final outputs. The WG's responses to Charter Questions 2, 3, and 4 are indirectly reflected in these Outputs.[38] In particular, the final recommendations and implementation guidance that address Charter Question 3 are mostly derived from EPDP-IDNs Phases 1 and 2.[39] Accordingly, the WG's responses and corresponding final outputs are organized into the following topics as prescribed in both Phases 1 and 2 of the EPDP-IDNs:

- Topic 1: Requirements for the Set at the Top-level
- Topic 2: "Same Entity" Principle at the Top-level
- Topic 3: Application Submission, Administrative Check, Initial Evaluation
- Topic 4: Contractual Requirements
- Topic 5: Delegation and Removal
- Topic 6: Requirements for the Set at the Second-level
- Topic 7: "Same Entity" Principle at the Second-level and IDN Table Harmonization
- Topic 8: Adjustments in Registration Processes Pertinent to the Domain Name Lifecycle

Within the text of this document, the key words "MUST," "MUST NOT," "REQUIRED," "SHALL," "SHALL NOT," "SHOULD," "SHOULD NOT," "RECOMMENDED," "NOT RECOMMENDED," "MAY," and "OPTIONAL" are to be interpreted as described in RFC 2119.

[37] Outputs refer to both the final recommendations and implementation guidance produced by the LD PDP WG.
[38] Further details on the WG's approach related to the ccTLD Fast Track Process and the SubPro Final Report are provided in the WG's responses to Charter Questions 2 and 3 in this section – "Section 4."
[39] Further details on the WG's approach related to the EPDP-IDNs Phase 1 and Phase 2 are provided in the WG's responses to Charter Question 3 in "Section 4."

4.1 Charter Questions with Final Outputs

4.1.1 Charter Question 1

Under what circumstances should a base ASCII gTLD and the Latin script diacritic version of the gTLD be simultaneously delegated, if any? If such circumstances exist, what measures should be put into place in order to mitigate the potential for end-user confusion?

1) Topic 1: Requirements for the Set at the Top-level

Final Output:

Final Recommendation 1: In order for any gTLDs to be considered an ASCII/Latin Diacritic gTLD Set, they MUST meet the following requirements:
1.1 The only distinction between an ASCII gTLD string and its corresponding Latin diacritic gTLD string(s) MUST be the presence of diacritical marks.
1.2 Eligible characters for the ASCII/Latin Diacritic gTLD Set are bound by the Unicode Table.[40] These are all characters with a Unicode name of "LATIN SMALL LETTER <x> with <y>," where <x> is an ASCII character and <y> is one or multiple diacritical marks. In addition, all combining sequences consisting of one ASCII character and one or more combining marks are included.
1.3 As determined via Recommendation 25.2 of the SubPro Final Report and Final Recommendation 1.1 of the EPDP-IDNs Phase 1 Final Report, the use of diacritical character(s) MUST conform to the eligibility criteria defined in the RZ-LGR.
1.4 A base ASCII gTLD is REQUIRED in order to constitute an ASCII/Latin Diacritic gTLD Set, and the set will cease to exist if the ASCII gTLD is removed from the root zone. In such a case, the gTLD registry operator MAY retain a single IDN gTLD, which will no longer be considered part of an ASCII/Latin Diacritic gTLD Set.[41]
1.5 None of the gTLD strings that constitute an ASCII/Latin Diacritic gTLD Set may be part of a Variant TLD Set.

Rationale:

Rationale for Final Recommendation 1:
The LD PDP WG addressed Charter Question 1 to establish the scope of valid ASCII/LD gTLD Sets from the outset and devoted substantial time for deliberations and refinement, even well

[40] Unicode Table, with the list of characters determined within and out of scope is presented here by the LD PDP WG: https://icann-community.atlassian.net/wiki/spaces/gnsolsdpdp/pages/114623451/3.+Background+Documents (Note: This is not an exhaustive list and is subject to change with future versions of the RZ-LGR.)
[41] Provisions for the removal of ASCII gTLDs are outlined in Final Recommendation 37, while those for LD gTLDs are outlined in Final Recommendation 38.

beyond the Public Comment period, in light of community and ICANN org concerns. These iterative discussions helped set the necessary boundaries in consideration of the exception process.

Final Recommendation 1 outlines the defined scope determined by the LD PDP WG. It also sets out the requirements that must be met for any gTLDs to qualify as an ASCII/LD gTLD Set – thereby responding to the "what" aspect of the Charter question (Charter Question 1) regarding when such confusingly similar, non-variant gTLDs may be simultaneously delegated.

The LD PDP WG determined an LD gTLD string to depend on the presence of diacritical marks (e.g., ¸ , ˆ , ´), and a diacritical character (e.g., ç, î, ý) is bound by the Unicode Table. Fundamentally, the distinction between two gTLDs in such a set – e.g., between an ASCII gTLD and its corresponding LD gTLD string – must be solely the presence of one or more diacritical mark(s), as outlined in Final Recommendation 1.1. However, per Final Recommendation 1.2, the WG agreed that eligible characters defined by this PDP are not limited to those characters that can be decomposed or contain decomposable marks, thus including characters with a Unicode name of "Latin Small Letter <x> WITH <y>" where <x> is an ASCII character and <y> is one or multiple diacritical marks, which is non-decomposable into an ASCII gTLD. A non-exhaustive list per the Unicode Table provides a clear delineation of scope for this aspect of the PDP.[42]

This means that the WG includes non-decomposable "WITH" letters like ø, ł, ƥ, and ɲ that cannot be decomposed into an ASCII character and one or more combining diacritical mark(s), while setting a limit to adding "WITH" only in the Unicode Table. This outcome was a compromise that enabled the WG to maintain a tightly focused and limited scope, while deferring any broader issues to future PDPs. In doing so, the WG preserved a narrower, more agile, and efficient process without limiting characters to a single decomposability aspect. This revised approach balanced concerns from the community regarding the restrictive nature of the scope with the need to consider the conservatism principle raised by ICANN org that guided the WG's overall Public Comment Review process.

Final Recommendation 1.3 guides that the use of diacritical character(s) must conform to the eligibility criteria defined in the RZ-LGR, as determined via Recommendation 25.2 of the SubPro Final Report and Final Recommendation 1.1 of the EPDP-IDNs Phase 1 Final Report. However, as mentioned above, the list is non-exhaustive and may be subject to change with future versions of the RZ-LGR.

The LD PDP WG also discussed at length the conditions and requirements to qualify as part of the set, including whether the presence of a base ASCII gTLD is required for the set to exist, particularly in scenarios where multiple diacritic versions of TLDs are permitted simultaneously and the set is not just limited to two gTLDs. Although the ASCII/LD gTLD Set does not function in such a way that the LD gTLD is dependent upon its corresponding ASCII gTLD, the WG determined that the presence of a base ASCII gTLD is essential for the set to exist, particularly given that it is established and governed by the WG Charter. Accordingly, if the ASCII gTLD is removed from the root zone, the set ceases to exist. However, the gTLD registry operator may retain a single IDN gTLD which will no longer be considered part of an ASCII/LD gTLD Set, per

[42] Note that this list of eligible characters is subject to change with future versions of the RZ-LGR.

Final Recommendation 1.4. Again, it is important to note that two LD gTLDs without a common base ASCII gTLD cannot coexist due to the risk of user confusion stemming from their visual similarity.

During the LD PDP WG's Stress Testing of potential edge cases to assess the soundness of the WG's preliminary recommendations for the publication of the Initial Report, scenarios involving the co-existence of both the ASCII/LD gTLD Sets and the Variant Domain Sets were examined, leading to an extensive discussion among the WG. One hypothesis considered whether an applicant having an ASCII/LD gTLD Set might wish to activate a variant of one of their TLDs; while another considered whether an applicant having a Variant Domain Set might wish to activate an LD gTLD for one of their TLDs. The key questions were whether both situations should be allowed, and if so, what policies may apply – i.e., LD PDP, EPDP-IDNs, or both?

In short, given the current limited scope of work and the fact that neither of the ASCII/LD gTLD Set or the Variant Domain Set has been put into practice, let alone operated concurrently, the WG concluded that the ASCII/LD gTLD Set and the Variant Domain Set must be restricted. This means that the ASCII/LD gTLD Set activation is restricted to single ASCII TLDs and the variant activation is prohibited in ASCII/LD gTLD Sets. Practically, this means that a variant contract cannot have any ASCII/LD gTLDs added to it, and an ASCII/LD gTLD Set contract cannot have variants added to it. This restriction is explicitly incorporated into the final clause of Final Recommendation 1, resulting in the following language: *"1.5 None of the gTLD strings that constitute an ASCII/Latin Diacritic gTLD Set may be part of a Variant TLD Set."*

Further details on this Stress Test, including the pros and cons of each option as well as the differing views of members can be found in "Annex C – Stress Test: Edge Case Studies" of this report.

Public Comment Review:

Final Recommendation 1 – Significant Change:

During the Public Comment period, concerns were raised by the community regarding the limited scope – specifically, the restrictive nature of decomposability when defining eligible characters, which in turn, resulted in the exclusion of non-decomposable characters – that are purely procedural and considered arbitrary. The community noted that such exclusion should not reflect a linguistic hierarchy or diminish the legitimacy of such characters in other IDN contexts. Meanwhile, ICANN org cautioned that a conservative approach be taken for the entire PDP.

In light of these considerations, the WG found that expanding the list of characters and the definition of diacritics would not adversely affect the security and stability of the DNS. Moreover, revisions made elsewhere and throughout the report sufficiently preserved conservatism in the broader context. Accordingly, the WG agreed to expand the scope to include WITH characters in the Unicode Table (Small Latin character WITH).

Consequently, the policy intent, requirements, and related language for Final Recommendation 1 were substantially revised to reflect this change. The revisions are as follows:
"1.1 The only distinction between an ASCII gTLD string and its corresponding Latin diacritic gTLD string(s) must be the presence of diacritical marks.
1.2 Eligible characters for the ASCII/Latin Diacritic gTLD Set are bound by the Unicode Table. These are all characters with a Unicode name of "LATIN SMALL LETTER <x> with <y>," where <x> is an ASCII character and <y> is one or multiple diacritical marks. In addition, all combining sequences consisting of one ASCII character and one or more combining marks are included."

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2) Topic 2: "Same Entity" Principle at the Top-level

Final Output:

Final Recommendation 2: Consistent with Final Recommendation 2.1 of the EPDP-IDNs Phase 1 Final Report,[43] all gTLDs that constitute an ASCII/Latin Diacritic gTLD Set can only be allocated to the same gTLD registry operator.

Rationale:

Rationale for Final Recommendation 2:
The LD PDP WG reviewed both the SubPro PDP Recommendation 25.5[44] and the EPDP-IDNs Phase 1 Final Recommendation 2.1 per WG's Charter Question 3[45] and agreed to extend the recommendations to the LD PDP when addressing the fundamental questions posed in Charter Question 1. In line with the requirements outlined in Final Recommendation 1, the WG found that aligning with the "same entity" principle and ensuring the same gTLD registry operator manage and operate both the ASCII gTLD and its corresponding LD gTLD(s) would help mitigate potential user confusion in the event of simultaneous delegation. This addresses the "how" aspect of Charter Question 1, specifically regarding the measures that should be put in place for the mitigation of potential end-user confusion.

[43] EPDP-IDNs P1 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.
[44] SubPro PDP Final Report Recommendation 25.5: IDN gTLDs identified as variant TLDs of already existing or applied for gTLDs will be allowed only if labels are allocated to the same entity and, when delegated, only if they have the same back-end registry service provider. This policy must be captured in relevant Registry Agreements.
[45] LD PDP WG Charter Question 3: If a solution is needed to this issue, are any of the elements from either Phase 1 or Phase 2 of the EPDP on IDNs, or Topic 25 on IDNs from the SubPro Final Report, relevant, or warrant discussion specific to Latin script diacritics?

Moreover, the WG had previously determined during the scope establishment phase to include all ASCII gTLDs and their corresponding LD gTLD(s) under the LD PDP policy – whether they already exist or will be new applications for future rounds – thus setting no limitations based on application timing for their delegation or allocation. Naturally, all existing or future ASCII gTLD or LD gTLD(s) can only be allocated to the same gTLD registry operator.

As outlined in Final Recommendation 6, the pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement. No new applications shall be permitted for those existing gTLDs that continue to be operated under different entities.

Public Comment Review:

Final Recommendation 2 – Support as written:
The LD PDP WG received support from several commenters on this recommendation as written.

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3) Topic 3: Application Submission, Administrative Check, Initial Evaluation

Final Outputs:

Final Recommendation 3: Consistent with Final Recommendation 3.2 of the EPDP-IDNs Phase 1 Final Report,[46] a future gTLD registry operator wishing to apply for a corresponding ASCII gTLD or Latin diacritic gTLD(s) of their existing gTLD MUST submit an application during an application round.

Final Recommendation 4: Consistent with Final Recommendation 3.3 of the EPDP-IDNs Phase 1 Final Report,[47] applications for a corresponding ASCII gTLD or

[46] EPDP-IDNs P1 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.
[47] EPDP-IDNs P1 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.

Latin diacritic gTLD(s) of their existing gTLDs can be submitted during the immediate next application round of the New gTLD Program[48] or in any subsequent rounds.

Final Recommendation 5: Consistent with Final Recommendation 3.4 of the EPDP-IDNs Phase 1 Final Report,[49] a future applicant applying for an ASCII gTLD string together with one or more corresponding Latin diacritic gTLD string(s) that constitute a set in the same round is REQUIRED to submit a single application for the set.

Final Recommendation 6: The String Similarity Evaluation Panel SHOULD NOT permit any ASCII gTLD and its corresponding Latin diacritic gTLDs to proceed independently through separate applications; such gTLDs MAY only proceed and be delegated as an ASCII/Latin Diacritic gTLD Set by a single entity. Potential applications where an ASCII gTLD or Latin diacritic gTLD(s) correspond(s) to their existing gTLD can still be applied-for by the same entity as an ASCII/Latin Diacritic gTLD Set per Final Recommendation 3. For the avoidance of doubt, the pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement. No new applications SHALL be permitted for those existing gTLDs that continue to be operated under different entities.

Final Recommendation 7: The exemption of gTLDs MAY no longer apply under one of the following circumstances:
7.1 if only a single gTLD remains, and all others have ceased to exist among the exempted ASCII gTLD and all its corresponding Latin diacritic gTLDs; or
7.2 if all gTLDs among the exempted ASCII gTLD and all its corresponding Latin diacritic gTLDs belong to the same gTLD registry operator and are operated by the same Registry Service Provider (RSP), and the gTLD registry operator elects to convert the existing stand-alone gTLDs into an ASCII/Latin Diacritic gTLD Set.

[48] Per Recommendation 3.7 of the SubPro Final Report, new policy development during an ongoing round must only apply to the opening of the application procedure subsequent to the adoption of the relevant recommendations by the ICANN Board. Specifically, Recommendation 3.7 of the SubPro Final Report stipulates, "If the outputs of any reviews and/or policy development processes has, or could reasonably have, a material impact on the manner in which application procedures are conducted, such changes must only apply to the opening of the application procedure subsequent to the adoption of the relevant recommendations by the ICANN Board." Further to this, the LD PDP WG considers it out of scope for this PDP to determine precisely which round the outputs refer to.

[49] EPDP-IDNs P1 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 the variant label(s).

In consideration of circumstance 7.1, where only a single gTLD remains, the gTLD registry operator wishing to apply for a new corresponding ASCII gTLD or Latin diacritic gTLD(s) of its remaining gTLD MUST submit an application during an application round in accordance with Final Recommendations 3 and 4.

In consideration of circumstance 7.2, where an ASCII gTLD and all of its corresponding Latin diacritic gTLD(s) belong to the same gTLD registry operator and are operated by the same RSP, the gTLD registry operator MAY elect to convert all existing stand-alone gTLD(s) into an ASCII/Latin Diacritic gTLD Set by submitting a request to ICANN org, provided that no new gTLD is added at the same time and/or a part of the same request. When such conversion is undertaken, all those stand-alone corresponding ASCII/Latin Diacritic gTLD strings that constitute the set MUST be included. A partial conversion to an ASCII/Latin Diacritic gTLD Set is not permitted. The proposed approach MUST be discussed with ICANN org, and conversion is subject to ICANN org's approval.

Final Recommendation 8: Consistent with Final Recommendation 3.25 of the EPDP-IDNs Phase 1 Final Report,[50] after submission of an application,[51] the applicant is allowed to withdraw an applied-for gTLD string from that application, but is not allowed to add any other gTLD strings that were not originally applied-for in that application. Only an applicant for a .Brand TLD string whose applied-for ASCII gTLD string and/or Latin diacritic gTLD string(s) are placed in a contention set is allowed to change its applied-for ASCII gTLD string and its Latin diacritic string(s) under the condition set out in SubPro PDP Recommendation 20.8.

Implementation Guidance 9: With respect to the withdrawal of an applied-for gTLD string per Final Recommendation 8, it can be divided into one of the following scenarios:
9.1 If the application contains a single ASCII gTLD string and multiple Latin diacritic gTLD strings and one applied-for Latin diacritic gTLD string is withdrawn from that application, the application will continue to be treated as a set under the exception process; or
9.2 If the application contains a single ASCII gTLD string and a single Latin diacritic gTLD string and either of the applied-for gTLD string is withdrawn, the

[50] EPDP-IDNs P1 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.
[51] For the avoidance of doubt, "application" here refers to the application of an ASCII/LD gTLD Set.

set will cease to exist, and the application of the single gTLD string MAY proceed only through the standard process.

With respect to the withdrawal of an applied-for gTLD string that corresponds to its existing gTLD pursuant to Final Recommendations 3 and 4, it can also be divided into one of the following scenarios:
9.3 If the application that corresponds to an existing gTLD contains either a single ASCII gTLD string or a single Latin diacritic gTLD string and the only applied-for gTLD string is withdrawn, the application is no longer relevant;
9.4 If the application that corresponds to an existing ASCII gTLD contains multiple Latin diacritic gTLD strings and one applied-for Latin diacritic gTLD string is withdrawn from that application, the application will continue to be treated as a set under the exception process; or
9.5 If the application that corresponds to an existing Latin diacritic gTLD contains a single ASCII gTLD string and at least one Latin diacritic gTLD string and the applied-for ASCII gTLD string is withdrawn, the set will cease to exist and the application cannot proceed. If an applied-for Latin diacritic gTLD string is withdrawn instead from that application, the application will proceed in accordance with scenario 9.4.

With respect to the Limited Public Interest Objection, Legal Rights Objection, String Confusion Objection, and Community Objection, any possible outcomes that prevent an applied-for gTLD string from continuing SHALL proceed in accordance with the withdrawal provisions that impact the set outlined from 9.1 through 9.5 above.

Final Recommendation 10: Consistent with Final Recommendation 3.5 of the EPDP-IDNs Phase 1 Final Report,[52] in addition to explaining the mission and purpose of the applied-for ASCII gTLD string or existing gTLD, the applicant seeking one or more Latin diacritic gTLD string(s) will describe the justification of such need. The justification given by the applicant SHALL at minimum provide the following information:

[52] EPDP-IDNs P1 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.

10.1 The meaning or intended meaning (for non-dictionary words) of each of the applied-for ASCII gTLD string and/or Latin diacritic gTLD string(s), including sources;
10.2 An explanation of how the ASCII gTLD and Latin diacritic gTLD strings are considered the same;
10.3 The benefits and the user communities who will benefit from the introduction of the applied-for ASCII gTLD string and/or Latin diacritic gTLD string(s); and
10.4 A description of the steps that the applicant will take to minimize the operational and management complexities of the corresponding ASCII gTLD and its Latin diacritic gTLD string(s) that impact registrars, resellers, and/or registrants.

Implementation Guidance 11: Consistent with Implementation Guidance 3.6 of the EPDP-IDNs Phase 1 Final Report,[53] with respect to the evaluation of the information submitted per Final Recommendation 10:
11.1 The evaluation panel MUST include evaluators with Latin script expertise;
11.2 The evaluation panel SHOULD apply criteria based on a general standard of reasonableness and the criteria MUST be established during implementation;
11.3 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);
11.4 The applicant MUST pass each element to enable the applied-for string(s) in an ASCII/Latin Diacritic gTLD Set to proceed to the next stage of the application process;[54]
11.5 The evaluation outcome of any one applied-for Latin diacritic gTLD string SHOULD NOT impact the evaluation outcome of any other Latin diacritic gTLD string(s) in the application (including the ASCII gTLD string); and,
11.6 The negative evaluation outcome of an applied-for ASCII gTLD string impacts the evaluation of any other Latin diacritic gTLD string(s) in the application by causing the dissolution of the set. For the avoidance of doubt, if only multiple Latin diacritic gTLD strings remain in the application process, the

[53] EPDP-IDNs P1 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).
[54] Refer to the "extended evaluation" process for variant string evaluation which may be applicable for the evaluation of the ASCII gTLD string and/or the LD gTLD string(s): https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf#page=37

applicant MUST select one Latin diacritic gTLD string to proceed under the standard application process.

Final Recommendation 12: Consistent with Final Recommendation 3.7 of the EPDP-IDNs Phase 1 Final Report,[55] a future applicant MUST be REQUIRED to demonstrate its ability to manage the applied-for ASCII gTLD string and applied-for Latin diacritic gTLD string(s) from both technical and operational perspectives. The same requirement applies to existing gTLD registry operators who wish to apply for either the corresponding ASCII gTLD string or Latin diacritic gTLD string(s) of their existing gTLD.

Implementation Guidance 13: Consistent with Implementation Guidance 3.8 of the EPDP-IDNs Phase 1 Final Report,[56] the evaluation of capability to manage the ASCII/Latin Diacritic gTLD 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 any applied-for ASCII gTLD string and/or Latin diacritic gTLD string(s).

Implementation Guidance 14: Generally consistent with Implementation Guidance 3.9 of the EPDP-IDNs Phase 1 Final Report,[57] within approximately 15 months of the delegation of the first ASCII gTLD string or the Latin diacritic gTLD string(s) that constitute the ASCII/Latin Diacritic gTLD Set, and approximately every 24 months thereafter, ICANN org SHOULD conduct research in order to identify whether any additional criteria or tests SHOULD be

[55] EPDP-IDNs Phase 1 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.

[56] EPDP-IDNs Phase 1 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).

[57] EPDP-IDNs Phase 1 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.

used, as part of the application process, to evaluate the technical and operational capability of an applicant to manage the ASCII/Latin Diacritic gTLD Set at the registry level. For LD PDP, this SHOULD NOT be treated as a separate research effort, but rather, where practical, conducted together with the EPDP-IDNs research on variants per Implementation Guidance 3.9. Similar to EPDP-IDNs, 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.

Final Recommendation 15: Generally consistent with Final Recommendation 3.10 of the EPDP-IDNs Phase 1 Final Report,[58] the fee structure associated with future applications that include the ASCII/Latin Diacritic gTLD Set MUST be consistent with the principle of cost recovery reflected in the 2026 Round AGB and affirmed by the New gTLD Subsequent Procedures PDP.

Final Recommendation 16: Consistent with Final Recommendation 3.13 of the EPDP-IDNs Phase 1 Final Report[59] and Final Recommendation 15, a future gTLD registry operator applying only for the corresponding ASCII gTLD or Latin diacritic gTLD(s) of their existing gTLD MUST incur an application fee consistent with the principle of cost recovery reflected in the AGB. ICANN org will decide 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.

[58] EPDP-IDNs Phase 1 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.

[59] EPDP-IDNs Phase 1 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.

Final Recommendation 17: Consistent with Final Recommendation 3.16 of the EPDP-IDNs Phase 1 Final Report,[60] all gTLDs that constitute an ASCII/Latin Diacritic gTLD Set MUST be subject to the same application requirements and evaluation criteria. With respect to the three non-standard application types of gTLDs as identified by the SubPro PDP, this means that:
17.1 An applicant for a Community gTLD string(s) that constitute(s) an ASCII/Latin Diacritic gTLD Set is REQUIRED to submit a written endorsement for each string that constitutes the set from established institution(s).[61]
17.2 An applicant for a Geographic Name TLD string(s) that constitute(s) an ASCII/Latin Diacritic gTLD set is REQUIRED to submit documentation of support or non-objection for each string that constitutes the set from relevant governments or public authorities.
17.3 An applicant for a .Brand TLD string(s) that constitute(s) an ASCII/Latin Diacritic gTLD Set is REQUIRED to submit proof that its applied-for ASCII gTLD and Latin diacritic gTLD(s) that constitute the set are identical to registered trademarks owned and used by the registry operator or its affiliate.

[60] EPDP-IDNs Phase 1 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.

[61] According to the AGB for the New gTLD Program: 2026 Round, several factors may be considered in whether an entity qualifies as an “established institution.” These factors include, but are not limited to: the level of global recognition of the institution; the length of time the institution has been in existence; and public historical evidence of its existence, such as the presence of a formal charter or national or international registration, or validation by a government, inter-governmental organization, or treaty. Importantly, the institution must not have been established solely in conjunction with the gTLD application process. Refer to the determination of an “established institution" in the AGB: https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf#page=104

Rationales:

Rationale for Final Recommendation 3:

The LD PDP WG affirms the EPDP-IDNs Phase 1 Final Recommendation 3.2[62] and extends the same principle to the LD PDP. The WG recognizes that some gTLD registry operators may already hold an ASCII gTLD or LD gTLD(s) and may wish to apply for a corresponding gTLD. This recommendation addresses such potential applications where an ASCII or LD gTLD(s) corresponds to their existing gTLD, with the only distinction being the presence (or absence) of diacritical marks, as outlined in Final Recommendation 1. For the avoidance of doubt, the pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement, per Final Recommendation 6. No new applications shall be permitted for those existing gTLDs that continue to be operated under different entities until the exemption process ends, as outlined in Final recommendation 7.

Similarly to EPDP-IDNs, the WG agrees that the most expedient and cost-effective path for future gTLD registry operators to apply for ASCII gTLD and LD gTLD(s) is through application rounds. The LD PDP WG did consider the possibility of a "no rounds" model in the future and how circumstances may evolve under an ongoing application process in place. However, this is still a subject of debate and is not currently in effect; any such changes would also need to be applied to EPDP-IDNs recommendations. Therefore, the WG decided to remain consistent with the EPDP-IDNs at this time.

Hence, the gTLD registry operators are expected to rely on application rounds to apply for an ASCII gTLD and/or LD gTLD(s) when applying for them as part of their existing gTLDs. In other words, no separate process will be made available or developed for existing gTLD registry operators to apply for an ASCII or LD gTLD(s) of their existing gTLDs. Accordingly, the LD PDP WG believes that new applications are required even for those associated with existing gTLDs.

Public Comment Review:

Final Recommendation 3 – Support as Written:

The LD PDP WG received support from several commenters on this recommendation as written.

Rationale for Final Recommendation 4:

This recommendation extends from Final Recommendation 3 where the WG agrees that, at this time, the most expedient and cost-effective path forward for gTLD registry operators to apply for ASCII gTLD and/or LD gTLD(s) of the existing gTLDs is through application rounds. This means that no separate process is required or should be developed for this purpose. Accordingly, applications for corresponding ASCII gTLD or LD gTLD(s) of existing gTLDs can be submitted during the immediate next application round of the New gTLD Program or in any subsequent rounds. However, of particular note here is, per Recommendation 3.7 of the SubPro Final Report,

[62] EPDP-IDNs P1 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.

new policy development during an ongoing round must only apply to the opening of the application procedure subsequent to the adoption of the relevant recommendations by the ICANN Board. The WG considered it out of scope for this PDP to determine precisely which round this recommendation refers to. In addition, the debate on application rounds (possibility of "no rounds") aligns with the rationale provided in Final Recommendation 3.

Public Comment Review:

Final Recommendation 4 – Wording Change:

ICANN org suggested that the WG revise the language to clarify that the "immediate next application round" refers to the first application round that occurs following the effective date of the relevant consensus policy resulting from ICANN Board adoption of the LD PDP outputs (not the 2026 Round). The WG determined that it is out of scope for this PDP to define what "Round" the outcome of this work refers to and agreed to leave the wording as-is and stay consistent with EPDP-IDNs; however, the WG decided to clarify this point, thus adding to the footnote, "Further to this, the LD PDP WG considers it out of scope for this PDP to determine precisely which Round the outputs refer to."

Rationales for Final Recommendations 5-7:

The LD PDP WG considered the implications of EPDP-IDNs Phase 1 Final Recommendation 3.4[63] and discussed at length whether it was applicable for the LD PDP when viewed as an "exception process," as opposed to the standard process for the New gTLD Program: 2026 Round and subsequent rounds – which refers to the existing framework in which applicants would submit separate applications for ASCII and LD gTLD(s). The WG examined various issues, including the categorization of strings (i.e., primary and secondary), administrative and legal matters within the application process itself, and cost-related factors.

First, while EPDP-IDNs dealt with primary gTLD strings and their allocatable variant label(s), the LD PDP WG determined that primary strings do not exist in the context of LD PDP. However, considering that the WG had established during its early deliberation phase that a base ASCII gTLD string is a requirement for the delegation and operation of the set (ASCII and LD gTLD[s]), as guided through the WG Charter and also outlined in Final Recommendation 1, it appeared reasonable to consider the ASCII gTLD akin to the base string.

To ensure a smooth and streamlined application process, while addressing administrative and legal considerations, the WG raised no objections to applying the same rule from the EPDP-IDNs, whereby a single application is submitted for the set. This provides certainty that none of the strings will be rejected for being confusingly similar to one another, unless an objection is raised from a third party.

[63] EPDP-IDNs P1 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 the variant label(s).

Following the Public Comment, and recognizing the need for a conservative approach, the WG went further to develop a recommendation *(Final Recommendation 6)* that permits only applicants to utilize the exception process – LD PDP Process and the only path in this context – and submit all ASCII and LD gTLDs together as a set in a single application. This means that the corresponding strings cannot proceed independently through separate applications. This approach removes ambiguity by establishing that if you want two or more corresponding gTLDs to co-exist, the LD PDP process is the sole available route and that the standard process cannot be pursued. The newly established Final Recommendation 6 prescribes that the String Similarity Evaluation Panel should not permit any gTLDs to proceed independently through separate applications – permitting those gTLDs to only proceed and be delegated as a set by a single entity. The WG concluded that this approach provides the most efficient, streamlined, and the most cost-effective framework for future gTLD registry operators, while maximizing certainty and ensuring that security and stability of the DNS is not adversely impacted.This clearly indicates that such applications, which must be submitted under the exception process as a single set, cannot later be unbundled.[64]

Nevertheless, this recommendation does not preclude the circumstance where an applicant only applies for an ASCII gTLD or a LD gTLD during an application round and does not wish to apply for its corresponding string(s). Similarly, as stipulated in Final Recommendation 3, those existing gTLD registry operators wishing to apply for an ASCII and/or LD gTLD(s) are required to submit new applications, even if the applied-for gTLD corresponds to or is associated with an existing gTLD. These applications must provide details and justifications as outlined in Final Recommendation 10. This is also emphasized in Final Recommendations 6 and 7.

That said, the pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement, per Final Recommendation 6. No new applications shall be permitted for those existing gTLDs that continue to be operated under different entities, to avoid making the exemption situation further complicated. However, to address and ultimately resolve the exemption of such gTLDs, which represents a desired outcome of this PDP, Final Recommendation 7 has been introduced to establish the conditions under which an exemption situation may be brought to an end *(Final Recommendations 7.1 and 7.2)*. Where an ASCII gTLD and all of its corresponding LD gTLD(s) belong to the same gTLD registry operator and are operated by the same RSP, the gTLD registry operator may exercise the option to convert all existing stand-alone gTLD(s) into an ASCII/LD gTLD Set. To initiate the conversion process, the gTLD registry operators must submit a request to ICANN org, which will be subject to ICANN org's approval. ICANN org retains the discretion to approve or reject such requests. Throughout this process, all those stand-alone corresponding ASCII/LD gTLD strings that constitute the set must be included where a partial conversion to an ASCII/LD gTLD Set is not permitted. No new gTLD should be added at the same time and/or a part of the same request. Further details are outlined in Final Recommendation 7.

[64] Note that "(un)bundling" applies solely to the application process. Once the ASCII/LD gTLD Set is allocated and delegated to a gTLD registry operator, the voluntary dissolution of the set is at the gTLD registry operator's discretion. Compare this recommendation to Final Recommendations 37-38, 40, and Implementation Guidance 39.

As for the debate on application rounds (possibility of "no rounds"), this remains aligned with the rationale provided in Final Recommendation 3.

Public Comment Review:

Final Recommendation 5 – Support as Written, but with Permission Changes updated in the Rationale – Relates to the Introduction of Final Recommendations 6 and 7:

The LD PDP WG received support from the community on this recommendation as written. Thus, the single application remains applicable even after the Public Comment period. However, while the WG initially agreed that, during the application rounds, if an ASCII gTLD string is sought with one or more of its corresponding LD gTLD string(s) at the same time, the applicant could choose which process to follow – Standard Process or the LD PDP Process – the WG subsequently revised this approach in light of the Public Comment Review. Following deliberations with the overall objective of adopting a conservative approach, while also improving predictability and ensuring stability, the WG ultimately determined that applicants can only opt for the LD PDP route, submitting a single application as a set, where any ASCII gTLD and its corresponding LD gTLDs cannot proceed independently. This revision and relevant requirements led to the creation of Final Recommendations 6 and 7.

Meanwhile, all reference to "label(s)" that were transferred from EPDP-IDNs was revised to "string(s)" for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

Rationales for Final Recommendation 8 and Implementation Guidance 9:

In accordance with EPDP-IDNs Phase 1 Final Recommendation 3.25,[65] the LD PDP WG agreed that withdrawal of an applied-for gTLD string should be allowed after the application has been submitted, but adding a new gTLD string to that submitted application is prohibited. Emphasizing that "withdrawal," and not "addition," is permitted, and that the resulting scenarios may vary depending on which gTLD string (ASCII gTLD or LD gTLD) is withdrawn under what circumstance (all new applied-for strings or an applied-for string that corresponds to an existing gTLD), the WG identified various scenarios and outlined their corresponding outcomes through Implementation Guidance 9.

In particular, as mentioned in the rationale for Final Recommendation 5, primary and variant labels do not exist in the context of LD PDP. However, the base ASCII gTLD string is a default condition for the set to exist – allocated, delegated, and operated – under the requirements set in Final Recommendation 1. Thus, while the WG does not prohibit which gTLD can be withdrawn, the underlying condition where a base ASCII gTLD must exist for the set to be

[65] EPDP-IDNs Phase 1 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.

effective impacts the application scenario. For example, the withdrawal of an applied-for ASCII gTLD string that results in a single LD gTLD will no longer be considered part of an ASCII/LD gTLD Set and does not need to utilize the LD PDP application process. Accordingly, the WG has specified when a set will cease to exist through scenarios 9.2 and 9.5 or the application no longer relevant per scenario 9.3 as they pertain to the application process.

In addition, any possible outcomes from objection scenarios (Limited Public Interest Objection, Legal Rights Objection, String Confusion Objection, and Community Objection) that prevent an applied-for gTLD string from continuing shall also proceed in accordance with the withdrawal scenarios that impact the set as outlined in Implementation Guidance 9.1 through 9.5.

As for the .Brand TLD string conditions, the LD PDP WG agrees with the rules set out in SubPro PDP Recommendation 20.8,[66] agreeing to permit string changes for an applied-for .Brand TLD string that is placed in a contention set under specific circumstances and conditions. Therefore, such modification is allowed for an applied-for ASCII gTLD string and its LD string(s) in a .Brand TLD application.

Public Comment Review:

Final Recommendation 8 – Wording Change – Impacts the Introduction of Implementation Guidance 9:

The LD PDP WG received support from several commenters on this recommendation, provided that wording is updated to retain a consistent drafting style when the LD PDP outputs are deemed "consistent" with the corresponding EPDP-IDNs Outputs. The WG updated the language to begin with *"Consistent with."*

Moreover, ICANN org requested that the phrase, *"the applicant is allowed to withdraw an applied-for gTLD label from the application"* be updated to clarify that only an LD gTLD string can be withdrawn. This request prompted the WG members to consider the various scenarios in which a withdrawal of a gTLD string could affect outcomes pertaining to the application process, resulting in the introduction of Implementation Guidance 9.

[66] SubPro Recommendation 20.8: The Working Group recommends allowing .Brand TLDs to change the applied-for string as a result of a contention set where (a) the change adds descriptive word to the string, (b) the descriptive word is in the description of goods and services of the Trademark Registration, (c) such a change does not create a new contention set or expand an existing contention set, (d) the change triggers a new operational comment period and opportunity for objection and, (e) the new string complies with all New gTLD Program requirements. When the .Brand applicant changes the applied-for string, the new string will also be considered a .Brand. The Working Group recognizes that an exception or a modification to Specification 13 will be needed to implement this recommendation. The Working Group further recognizes that in order to implement this recommendation, applications seeking to change their applied-for string will need to be evaluated for eligibility as a .Brand before the string change request can be accepted. This may occur either by ICANN specifically evaluating those individual applications during Initial Evaluation or by evaluating all applicants that elect to be .Brands during Initial Evaluation.

In addition, per ICANN org's public comment requesting the addition of a policy language that addresses objection outcomes – to mirror EPDP-IDNs P1 Final Recommendation. 5.5 – the WG agreed to provide such guidance to more explicitly cover objections, by updating the language in Implementation Guidance 9 (last paragraph) that deals with application submission and withdrawal/evaluation outcome scenarios, rather than creating a whole new recommendation.

All reference to "label(s)" that were transferred from EPDP-IDNs was revised to *"string(s)"* for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

Rationales for Final Recommendation 10 and Implementation Guidance 11:

The simultaneous delegation of gTLDs that constitute an ASCII/LD gTLD Set (i.e., an ASCII gTLD and its corresponding LD gTLD[s]) is also unprecedented and may only become possible through this exception process as an outcome of the LD PDP. This is a similar situation to the possible delegation of gTLD variant labels at the root zone, which resulted from the outcome of the EPDP-IDNs. Accordingly, justifications for the simultaneous delegation of the set will be crucial when applicants submit their applications.

Therefore, applicants must not only explain the mission and purpose of the applied-for ASCII gTLD string or existing gTLD but also provide, at a minimum, all four pieces of information outlined in Final Recommendation 10.1-10.4. It is important to note that the applicant is expected to answer these questions for each and every applied-for ASCII gTLD string and/or LD gTLD string(s). In this instance, the mission and purpose of the applied-for gTLD string as well as the existing gTLD are also critical, as it is possible that the mission has evolved for an existing gTLD, as well as for the overall set, not solely for the new TLDs. In any case, these questions are intended to demonstrate that the applicant has carefully considered whether the applied-for string(s) are needed to achieve their stated objectives and to ensure that the steps are well thought out regarding the management and operational complexities that may arise upon delegation of the set. In particular, the applicant must recognize the operational and management complexities that may impact registrars, resellers, and/or registrants. Final Recommendation 10.4 seeks to understand the applicant's proposed approach to minimize such complexities from operational and management standpoints. This provision plays a key role in promoting the conservatism principle by ensuring that the applicants carefully take the time to identify potential risks and consider appropriate risk mitigation measures. By way of explanation, management is responsible for overall strategic decision-making and resource allocation, while operation executes the plans and processes necessary for day-to-day functioning.

Moreover, the LD PDP WG deemed Implementation Guidance 3.6 from EPDP-IDNs Phase 1 Final Report applicable, ensuring clarity on how the applicant's responses to the elements established in Final Recommendation 10 should be evaluated and applied consistently for each applied-for

ASCII gTLD string and LD gTLD string(s). As outlined in Implementation Guidance 11.1, the WG required that the evaluation panel for the LD PDP exception process include evaluators with Latin script expertise. Other application criteria should follow the guidance provided in Implementation Guidance 11.2–11.5, consistent with Implementation Guidance 3.6 from EPDP-IDNs Phase 1 Final Report. Implementation Guidance 11.6 establishes the expectations where the evaluation outcome of an applied-for ASCII gTLD string negatively affects the evaluation of any other LD gTLD string(s) in the application, which results in the dissolution of the set.

Here, it is worth noting that those ASCII/LD gTLD Set applicants that may wish to appeal during the evaluation process should refer to the "Extended Evaluation" mechanism outlined in the AGB. Per AGB 1.2.14.1,[67] initial evaluation can sometimes lead to extended evaluation when the applicants are unable to resolve issues through clarifying questions. Accordingly, variant string evaluation is subject to this extended evaluation. Given that the LD PDP evaluation process is maintaining alignment with EPDP-IDNs, the extended evaluation might be the recommended course of action if such cases occur for the ASCII/LD gTLD Set applicants.

To summarize, the WG affirms the assessment from the EPDP-IDNs that the same requirements, as set out in Final Recommendation 10 and Implementation Guidance 11, will also apply to existing gTLD registry operators wishing to apply for corresponding ASCII gTLD and/or LD gTLD(s) of their existing gTLDs.

Public Comment Review:

Final Recommendation 10 – Significant Change:

The LD PDP WG was requested by ICANN org to reassess this recommendation in accordance with the conservatism principle. Although additional requirements were considered during the process to ensure appropriate risk mitigation, the WG ultimately determined that Final Recommendation 10.4 is sufficient under the conservatism principle. Accordingly, the existing language was retained without a need for additional language.

That said, ICANN org noted that the policy language does not fully mirror EPDP-IDNs, since Final Recommendation 3.5.2 from EPDP-IDNs Phase 1, *"Explanation of how the primary and variant labels are considered the same"* has been omitted. The WG discussed whether this language should be brought back and applied to LD PDP, including whether the "same meaning" was justified. Following these discussions, the WG concluded that, although the underlying meaning may not be identical, it would be useful to clarify why the strings may be conceived as equivalent

[67] AGB 1.2.14.1 Extended Evaluation: https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf#page=36

by the community. Accordingly, the omitted clause was reinstated: *"10.2 An explanation of how the ASCII gTLD and Latin diacritic gTLD strings are considered the same."* Concurrently, the WG emphasized that the process still should remain simple, proportionate, and not overly burdensome or complex, as outlined in Implementation Guidance 11.2: *"The evaluation panel should apply criteria based on a general standard of reasonableness and the criteria must be established during implementation"*

All reference to "label(s)" that were transferred from EPDP-IDNs was revised to *"string(s)"* for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

Implementation Guidance 11 – Significant Change:

The LD PDP WG received support from several commenters on this recommendation, provided that wording is updated to retain a consistent drafting style when the LD PDP outputs are deemed "consistent" with the corresponding EPDP-IDNs Outputs. The WG updated the language to begin with *"Consistent with."*

With respect to Implementation Guidance 8.5 from the Initial Report, ICANN org observed that the WG had not addressed the impact of the evaluation outcome of the applied-for ASCII gTLD string within an ASCII/LD gTLD Set. Accordingly, an additional clause was added to Implementation Guidance 11 (11.6) to provide clarity for a situation when the evaluation outcome is negative for an applied-for ASCII gTLD string, and the new language is as follows: *"11.6 The negative evaluation outcome of an applied-for ASCII gTLD string impacts the evaluation of any other Latin diacritic gTLD string(s) in the application by causing the dissolution of the set. For the avoidance of doubt, if only multiple Latin diacritic gTLD strings remain in the application process, the applicant must select one Latin diacritic gTLD string to proceed under the standard application process."*

Another observation from ICANN org was that the LD PDP did not apply Final Recommendation 3.1[68] from the EPDP-IDNs Phase 1, and requested that the WG reassess whether a corresponding output could be developed to clarify the treatment of the ASCII gTLD string in the context of new gTLD application and the evaluation process. For LD PDP, the WG had initially determined that this was unnecessary as the ASCII gTLD does not need to come first – an LD gTLD is not dependent upon an ASCII gTLD other than that the ASCII/LD gTLD Set must have an ASCII gTLD. The WG maintained its position and decided not to apply this recommendation to LD PDP.

[68] EPDP-IDNs Phase 1 Final Recommendation 3.1: An application for an allocatable variant label cannot precede an application for that variant label's primary gTLD string.

With respect to the original phrase in Implementation Guidance 8.4 from the Initial Report, *"...to enable the applied-for ASCII gTLD string and/or the Latin diacritic gTLD label(s),"* ICANN org suggested revising the language to enhance clarity. The WG had no objections to and updated the language as follows: *"...to enable the applied-for string(s) in an ASCII/Latin Diacritic gTLD Set."*

All reference to "label(s)" that were transferred from EPDP-IDNs was revised to *"string(s)"* for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

Rationales for Final Recommendation 12 and Implementation Guidance 13-14:

The LD PDP WG affirmed that it is important for future applicants to demonstrate their technical capabilities to operate and manage the applied-for ASCII gTLD string as well as the corresponding applied-for LD gTLD string(s) that constitute the ASCII/LD gTLD Set. The same requirement applies to existing gTLD registry operators who wish to apply for the corresponding gTLDs – either the ASCII gTLD or the LD gTLD – of their existing gTLDs.

To this end, the evaluation of an applicant's capability to manage the ASCII/LD gTLD Set should be closely tied to the overall evaluation of the applicant's technical capability. Accordingly, the evaluation of technical and operational capability should be based on measurable criteria, which is to be determined during implementation. Such criteria may include, but not be limited to, the performance of the Critical Functions[69] with respect to second-level registrations under the ASCII gTLD string and the corresponding applied-for LD gTLD string(s).

Consistent with EPDP-IDNs, as the simultaneous delegation of gTLDs that constitute an ASCII/LD gTLD Set is unprecedented, there is uncertainty about how an ASCII gTLD string and its corresponding LD gTLD string(s) will be managed and operated concurrently by the same gTLD registry operator. Therefore, the LD PDP WG aligns with the intent of the rules outlined in Implementation Guidance 3.9 of the EPDP-IDNs Phase 1 Final Report; that 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 the ASCII/LD gTLD Set at the registry level. A key update here is that this should not be treated as a separate research; rather, conducted together, if necessary, with the EPDP-IDNs research on variants. In other words, a second, independent research that results in a separate report is likely unnecessary, since the technical handling of variants and the strings that

[69] The Critical Functions are: DNS Service, DNSSEC proper resolution, EPP, RDDS, and Data Escrow. See details in Section 6 of Specification 10 in the Base Registry Agreement: https://itp.cdn.icann.org/en/files/registry-agreements/base-registry-agreement-12-03-2026-en.pdf#page=95

constitute the ASCII/LD gTLD Set is expected to be the same. Accordingly, the WG agreed to allow flexibility in both the joint research requirements and timeline in which the research should be conducted for ICANN org, leaving it to its discretion to align the research timeline and conduct jointly, if deemed sensible. Therefore, ICANN org should conduct joint research, where practical, within approximately 15 months of the delegation of the first ASCII gTLD string or the LD gTLD string(s) that constitute the ASCII/LD gTLD Set, and approximately every 24 months thereafter, per Implementation Guidance 14.

Similar to EPDP-IDNs, ICANN org must provide public consultation opportunities on the scope and any proposed outputs of the research. For the avoidance of doubt, any such additional criteria or test should not be used to evaluate the technical and operational capability of a gTLD registry operator that has already been managing an ASCII/LD gTLD Set before such additional criteria or tests are published. In addition, the additional criteria or tests resulting from the research would not be required to undergo a PDP for confirmation and could be implemented directly following a Public Comment process.

Public Comment Review:

Final Recommendation 12 and Implementation Guidance 13 – Support as written with Minor Wording Change:

The LD PDP WG generally received support from several commenters on these outputs as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for LD PDP at the top-level, which is a recurring theme throughout the report.

Implementation Guidance 14 – Significant Change:

The LD PDP WG considered the comment from ICANN org regarding timeline expectations associated with conducting such research, particularly when conducted jointly, given that the delegation timelines for variant gTLD strings and the ASCII/LD gTLD strings are currently unknown and may depend on multiple variables. Accordingly, the policy language has been revised to provide greater flexibility in this regard, adding terms such as, *"approximately"* and *"where practical,"* while leaving the timing of any joint research to ICANN org's discretion. This flexible approach resulted in Implementation Guidance 14 being *"Generally consistent with Implementation Guidance 3.9,"* where the underlying intent and expected behavior remain the same, despite certain departures from the specific details.

The WG also validated the assumption through the Public Comment Review process that the additional criteria or tests resulting from the research would not be required to undergo a PDP for confirmation and could be implemented directly following a Public Comment process.

All reference to "label(s)" that were transferred from EPDP-IDNs was revised to *"string(s)"* for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

Rationales for Final Recommendations 15-16:

The LD PDP and EPDP-IDNs maintain an important divergence when it comes to application fees. For EPDP-IDNs, which was designed to promote IDNs and thereby create incentives for such applications, a future applicant applying for a primary gTLD string and up to four of that string's allocatable variant labels during an application round could incur the same base application fee as any other gTLD applicant not applying for variant labels in that round. In contrast, the purpose of the LD PDP is to create an exception process that allows strings to co-exist, which would otherwise likely be rejected for being too similar to one another. The LD PDP WG recognizes that the base ASCII gTLD and its corresponding LD gTLD(s) are independent – they are not dependent on one another for their existence, nor are they contingent upon each other, except for the purpose of application, delegation, and operational coherence. Therefore, any fee discount applicable in this context should not be considered equivalent to discounts in the EPDP-IDNs.

Building on this understanding, the LD PDP WG engaged in extensive discussions on this issue, aiming to fully understand the cost recovery principle and its implications, while also establishing clear boundaries to ensure that the process functions effectively. In essence, the WG agrees with and affirms the cost recovery principle as applied to the overall Program; that is, agreeing to SubPro PDP's Affirmation with Modification 15.4[70] that the New gTLD Program should be self-sustaining without the need for funding from other sources and that the program should operate on a cost recovery basis with the goal of being revenue neutral. This would mean that the total cost of running the Program should be collectively borne by all applicants. As such, new applicants are expected to subsidize not only the cost of their own applications but also the portion of costs associated with the Applicant Support Program (ASP) as well as the variant labels. This shared contribution is what allows for the so-called "discount."

From this standpoint, the WG considered three potential options for LD PDP on application fees: 1) charging a standard fee for all TLDs within the set. This means full price per gTLD even when applied as a set. The advantage of this approach is that it is the fastest and simplest to implement. However, this could potentially discourage applicants and limit the use of Latin script IDNs due to the high costs; 2) charging the full application fee for the main TLD while offering one or more additional string(s) in the set free of charge. This approach would significantly

[70] SubPro Final Report Affirmation with Modification 15.4:
The gTLD evaluation fee is set to recover costs associated with the new gTLD program. The fee is set to ensure that the program is fully funded and revenue neutral and is not subsidized by existing contributions from ICANN funding sources, including generic TLD registries and registrars, ccTLD contributions and RIR contributions.

reduce the financial burden for applicants seeking to apply for and operate the set. However, it could complicate cost recovery, particularly in relation to evaluation fees, which may have a program-wide impact, making it more difficult to accommodate. Moreover, the goal of EPDP-IDNs was to incentivize IDNs, while LD PDP has no such objective, and this option would ultimately mean that the ASCII/LD gTLD Sets get subsidized by all other applicants; 3) providing no specific guideline on application fees, and instead adhering to the cost recovery principle, whereby pricing would be determined during implementation. While this approach would be consistent with the overall Program, the WG would have no input or influence over how the application fees are ultimately set.

In conclusion, the LD PDP WG decided that the third option was the most appropriate, opting not to provide any specific recommendation on application fees, but instead adhering to the cost recovery principle.

In a similar manner, the LD PDP WG recommends that an application only for the corresponding ASCII gTLD or LD gTLD(s) of the existing gTLD must incur a discounted base application fee as determined by ICANN org and considered to be proportionate to any costs associated with evaluating the application and consistent with the cost recovery principle. Since the existing gTLD is already delegated to the applicant, there is a presumption that some evaluation elements for its corresponding gTLD(s) may not necessarily apply. Under this situation, such an application should not incur the same base application fee, nor should it be cost free. As such, a discount on the base application fee for such an application seems appropriate. Ultimately, ICANN org has the discretion to establish what constitutes a discount for cost recovery of LD gTLD applications.

Consequently, the WG upholds the conservatism principle through the establishment of Final Recommendations 15 and 16, given that they align with the cost recovery principle and are committed to ICANN org's discretion. Such guidance could help ensure that the ASCII/LD gTLD Sets remain limited in number, exceptional in nature, and subject to a high bar for successful evaluation, thereby preserving the integrity of the uniformly-applied variant definition and management rules while retaining a consistent, predictable, and transparent approach that contributes to the security and stability of the DNS.

Public Comment Review:

Final Recommendation 15 – Wording Change:

The LD PDP WG received support from several commenters on this recommendation, provided that it is reassessed to determine whether it is sufficient for risk mitigation and that it prevents potential proliferation of such exceptions. The WG determined that the conservatism principle is upheld by this recommendation and agreed to retain the language, except for an update to

exclude language corresponding to the "registry operators of existing gTLDs," since this is introduced in Final Recommendation 16. This led to Final Recommendation 15 being "generally consistent" with Final Recommendation 3.10 of the EPDP-IDNs.

Another minor update was the revision to *"string(s)"* from "label(s)" for LD PDP at the top-level, which is a recurring theme throughout the report.

Final Recommendation 16 – No Change:

Similar to Final Recommendation 15, the LD PDP WG received support from several commenters on this recommendation, provided that it is reassessed to determine whether it is sufficient for risk mitigation and that it prevents potential proliferation of such exceptions. Once again, the WG determined that the conservatism principle is upheld by this recommendation and agreed to retain the language, making it applicable for LD PDP but with no other specific changes to note.

Preliminary Recommendations 18 and 19 – Significant Change:

The LD PDP WG was requested by ICANN org to reassess these recommendations that address registry-level fees to determine whether they align with the conservatism principle. In conducting this reassessment, the WG recognized that not only are the registry-level fees tied to ICANN org's financial and operational responsibilities, but there is also no historical data concerning the volume and cost of variant gTLD strings to provide proper guidance. Moreover, the ICANN Board of Directors had previously stated that it does not wish to create a precedent that could limit its ability to adjust approaches if operational or financial impacts emerge in the future. This consideration was the rationale for adopting Final Recommendations 7.4 and 7.5 of EPDP-IDNs Phase 1, from which the draft recommendations were derived.

Over time, the Board provided formal input expressing concerns that these recommendations may not be adoptable. Registry fees have remained at the discretion of ICANN org and were out of scope for the LD PDP WG to make recommendations on. Consequently, the WG decided to remove Preliminary Recommendations 18 and 19 concerning the ongoing registry-level fees (annual and transaction). Accordingly, these recommendations are not reflected in the Final Report.

Rationale for Final Recommendation 17:

The LD PDP WG agrees that the same application requirements and evaluation criteria apply to all gTLDs that constitute an ASCII/LD gTLD Set. In particular, the three categories of gTLDs that have non-standard application types as identified by the SubPro PDP – 1) Community gTLD, 2) Geographic Name TLD, and 3) .Brand TLD – are bound by particular requirements detailed in Final Recommendation 17.1-17.3, consistent with Final Recommendation 3.16 of the EPDP-IDNs Phase 1 Final Report.

With respect to applications for .Brand TLD strings that constitute an ASCII/LD gTLD Set, each of the applied-for string(s) must be an exact match to and supported by a registered trademark of the gTLD registry operator or its affiliate, which aligns with EPDP-IDNs. The visual similarity between an ASCII trademark and a LD domain name can create legal challenges. Thus, an applicant for a .Brand TLD would need to provide individualized trademark registrations for each applied-for gTLD that constitute the set, to be allocatable to the particular trademark owner; this does not align with the trademark law but is mirroring the EPDP-IDNs language in order to uphold a stricter standard under the community-developed policy.

Public Comment Review:

Final Recommendation 17 – Significant Change:

The LD PDP WG received a substantive comment from the Intellectual Property Constituency (IPC) that raised concerns about a mischaracterized trademark law. According to the IPC, trademark rights attach to a particular mark but allow the trademark owner to prevent others from adopting any marks that are likely to cause consumer confusion – which extends to non-exact variations of the mark. Thus, under the trademark law, where the brand owner owns a registered trademark containing an LD, it should not be required to own registrations for all variations containing other LDs or a base ASCII gTLD string with no diacritics. The IPC suggested that it was unreasonable to expect a trademark owner to hold registrations for all such variants of its actual mark.

However, GNSO policy development may uphold a stricter standard under the community-developed policy per the EPDP-IDNs, recognizing how the visual similarity between an ASCII trademark and LD domain names may create legal challenges. Accordingly, the LD PDP WG decided to retain the rule, only updating the language to be more consistent with Final Recommendation 3.16.3 of the EPDP-IDNs Phase 1 (*"17.3 [...] its applied-for ASCII gTLD and Latin diacritic gTLD(s) that constitute the set are identical to registered trademarks…"*), while removing the sentence referenced in the rationale that does not align with trademark law: *"Thus, under trademark law, the rights are attached to one, distinct mark limited to an exact match."*

All reference to "label(s)" that were transferred from EPDP-IDNs was revised to *"string(s)"* for LD PDP at the top-level, following ICANN org's suggestions, as the distinction required in EPDP-IDNs for "variant labels" was not applicable here. The term "label" remains in use for the second-level.

4) Topic 4: Contractual Requirements

Final Outputs:

Final Recommendation 18: Consistent with Final Recommendation 7.1 of the EPDP-IDNs Phase 1 Final Report,[71] any future ASCII gTLD along with its Latin diacritic gTLD string(s) (if any) that constitute a set MUST be subject to one Registry Agreement with all gTLD labels in the set having the same service level agreements (SLAs) and other operational requirements.

Implementation Guidance 19: Consistent with Implementation Guidance 7.2 of the EPDP-IDNs Phase 1 Final Report,[72] a new specification or an amendment to the Base Registry Agreement for any future ASCII gTLD along with its Latin diacritic string(s) MAY need to be developed to incorporate ASCII/Latin diacritic gTLD string management provisions.

Final Recommendation 20: Consistent with Final Recommendation 7.3 of the EPDP-IDNs Phase 1 Final Report,[73] any existing gTLD registry operator that is successful in its future application for its corresponding ASCII gTLD or Latin diacritic gTLD string(s) per Final Recommendation 3 MUST be REQUIRED to adopt contractual terms to accommodate the newly approved string(s) by way of a new Specification to its existing Registry Agreement.

Final Recommendation 21: Consistent with Final Recommendation 7.6 of the EPDP-IDNs Phase 1 Final Report,[74] the RSP for each one of the Critical Functions as defined in the Base Registry Agreement MUST be the same for all ASCII/Latin diacritic gTLD strings that constitute a set. The Critical Functions are: DNS Service, DNSSEC proper resolution, EPP, RDDS, and Data Escrow.

[71] EPDP-IDNs Phase 1 Final Recommendation 7.1: Any future 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.
[72] EPDP-IDNs Phase 1 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.
[73] EPDP-IDNs P1 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.
[74] EPDP-IDNs P1 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.

Final Recommendation 22: Consistent with Final Recommendation 7.7 of the EPDP-IDNs Phase 1 Final Report,[75] if the gTLD registry operator changes its gTLD's RSP for any one of the Critical Functions, the corresponding allocated and delegated ASCII/Latin diacritic string(s) of that gTLD MUST simultaneously transition to the same RSP for that Critical Function.

Final Recommendation 23: Consistent with Final Recommendation 7.8 of the EPDP-IDNs Phase 1 Final Report,[76] in the event that a Registry Transition or Change of Control process is initiated for a gTLD, the process MUST encompass the gTLD and all its corresponding allocated and delegated ASCII/Latin diacritic gTLD string(s), if any, at the same time.

Final Recommendation 24: Consistent with Final Recommendation 7.9 of the EPDP-IDNs Phase 1 Final Report,[77] after the Registry Transition Process or Change of Control process is completed for a gTLD and its corresponding allocated and delegated ASCII/Latin diacritic gTLD string(s), the successor gTLD registry operator can apply for the other non-delegated Latin diacritic gTLD string(s) of the ASCII gTLD in accordance with the "same entity" principle pursuant to Final Recommendation 2.

Final Recommendation 25: Consistent with Final Recommendation 7.10 of the EPDP-IDNs Phase 1 Final Report,[78] emergency transition of a gTLD to an EBERO provider MUST include all the corresponding allocated and delegated ASCII/Latin diacritic gTLD strings that constitute the set, if any. All these strings MUST be transitioned to the same EBERO provider at the same time.

[75] EPDP-IDNs P1 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.
[76] EPDP-IDNs P1 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.
[77] EPDP-IDNs P1 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), 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.
[78] EPDP-IDNs P1 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.

Final Recommendation 26: Consistent with Final Recommendation 7.11 of the EPDP-IDNs Phase 1 Final Report,[79] in the event a gTLD is reassigned as a result of a TM-PDDRP determination, that reassignment MUST include all the corresponding allocated and delegated ASCII/Latin diacritic gTLD string(s) that constitute the set, if any, at the same time.

Final Recommendation 27: Consistent with Final Recommendation 7.12 of the EPDP-IDNs Phase 1 Final Report,[80] the same data escrow provider MUST be contracted for all the gTLDs that constitute an ASCII/Latin Diacritic gTLD Set.

Implementation Guidance 28: Consistent with Implementation Guidance 7.13 of the EPDP-IDNs Phase 1 Final Report,[81] the escrow data associated with each ASCII gTLD and each Latin diacritic gTLD string that constitute a set SHOULD be stored in separate files.

Final Recommendation 29: Generally consistent with Final Recommendation 7.14 of the EPDP-IDNs Phase 1 Final Report,[82] all the gTLDs that constitute an ASCII/Latin Diacritic gTLD Set through a single application MUST be bound by the same restrictions, which will become contractual requirements upon execution of the Registry Agreement. Similarly, any corresponding ASCII/Latin diacritic gTLD string 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 ASCII/Latin diacritic gTLD version of the string(s). The restrictions in this recommendation refer to the differential treatment and requirements applied to the TLDs subject to Category 1 Safeguards as well as to the non-standard types of gTLDs, which are Community gTLDs, Brand TLDs, Geographic Name TLDs.

[79] EPDP-IDNs P1 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.
[80] EPDP-IDNs P1 Final Recommendation 7.12: The same data escrow provider must be contracted for the gTLD and its allocated and delegated variant label(s).
[81] EPDP-IDNs P1 Implementation Guidance 7.13: The escrow data associated with each gTLD variant label should be stored in separate files.
[82] EPDP-IDNs P1 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.

Rationales:

Rationales for Final Recommendation 18, Implementation Guidance 19, and Final Recommendation 20:

The LD PDP WG upheld Final Recommendation 7.1 of the EPDP-IDNs Phase 1 Final Report to remain aligned with the "same entity" principle and to maintain the single application process for the ASCII/LD gTLD Set, as outlined in Final Recommendation 5. In accordance with this PDP, any future ASCII gTLD and the corresponding LD gTLD string(s) are expected to function as a set throughout their lifecycle. A single Registry Agreement serves as an important vehicle to keep the set together. Therefore, the LD PDP WG considers it both efficient and logical for all future gTLDs within the set to be governed by one Registry Agreement with one gTLD registry operator, as outlined in Final Recommendation 18. This also means that they must adhere to the same base terms and conditions within the single Registry Agreement, as authorized by ICANN, with each string having the same service level agreements (SLAs) and other operational requirements.

Currently, the future gTLD and its variant label(s) relationships are outlined in a new specification (New Specification 14) in an updated Base Registry Agreement of the AGB[83], which specifically incorporates variant management provisions and contractual requirements in accordance with Final Recommendations 7.6-7.7 from the EPDP-IDNs Phase 1 Final Report. The WG remains consistent with EPDP-IDNs on this approach – affirming that the ASCII/LD gTLD Sets should be contractually linked through a single Registry Agreement by adding a new specification in the future to explicitly incorporate ASCII/LD gTLD label management provisions – especially since the ASCII/LD gTLD Sets will be unified for the purpose of application, delegation, and operation, similar to the variant labels. When updating the new specification, Final Recommendations 21-22 should be taken into account.

In this context, those existing gTLD registry operators that are successful in their future applications for the corresponding ASCII or LD gTLD string(s) must also adopt contractual terms to accommodate the newly approved strings by way of a new specification in their existing Registry Agreements, as outlined in Final Recommendation 20. This requirement is especially important given that the Base Registry Agreement may be inadequate in form and substance to address any ASCII/LD gTLD management requirements, like they were for variant management. This approach aligns with Final Recommendation 18 and Implementation Guidance 19, which emphasizes the need for uniformity in the use of Registry Agreements by all gTLD registry operators – across both the existing and future – that manage the ASCII/LD gTLD Sets. Consistent

[83] Specification 14: Variant TLDs. See details in the Base Registry Agreement: https://itp.cdn.icann.org/en/files/registry-agreements/base-registry-agreement-12-03-2026-en.pdf#page=110

with EPDP-IDNs, the rules set out here also adhere to SubPro PDP Affirmation 36.2[84] which supports the "current practice of maintaining a single base Registry Agreement with 'Specifications'." That said, when a gTLD registry operator desires to convert all existing stand-alone gTLD(s) into an ASCII/LD gTLD Set per Final Recommendation 7, it must still submit a request to ICANN org and await approval, given that this circumstance may warrant further consideration that would be necessary for two or more independent contracts.

Public Comment Review:

Final Recommendations 18, 20, and Implementation Guidance 19 – Support as written with Minor Wording Change:

The LD PDP WG generally received support from several commenters on these Outputs as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for the LD PDP at the top-level, which is a recurring theme throughout the report.

Rationales for Final Recommendations 21-22:

As outlined in Final Recommendation 2, the LD PDP WG affirmed the "same entity" principle early on in the process establishing rules for the "how"– specifically, the measures required when delegating a base ASCII gTLD and the LD version of the gTLD that are confusingly similar but not variants of each other. This rule is intended to mitigate potential end-user confusion when such strings are delegated simultaneously.

Consistent with the EPDP-IDNs, the LD PDP WG emphasized the "same entity" principle throughout the deliberations and it was noted during the review of EPDP-IDNs policy recommendations that alignment with this principle is essential not only for the registries, registrars, and registrants – the external-facing entities – but also requires that the Critical Functions and Data Escrow providers be identical. This is particularly important to ensure feasible and consistent implementation of the "same entity" requirement at the top-level. Naturally, the LD PDP WG agrees with the EPDP-IDNs Team's proposal to extend the SubPro PDP Recommendation 25.5[85] to existing gTLDs.

[84] See Affirmation 36.2 in the SubPro PDP Final Report, p.183: https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=183

[85] See Recommendation 25.5 in the SubPro PDP Final Report, p.115: https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115; Recommendation 7 in the Staff Paper, p.4: https://www.icann.org/en/system/files/files/idn-variant-tld-recommendations-analysis-25jan19-en.pdf#page=4

Thus, in the event that an existing gTLD registry operator applies for corresponding gTLD strings that constitute an ASCII/LD gTLD Set in the future, it will be required to use the same registry service provider for the provision of its respective Critical Functions. As stated in Final Recommendation 21, the Critical Functions are: DNS Service, DNSSEC proper resolution, EPP, RDDS, and Data Escrow.[86] For example, its Data Escrow provider must be the same for the existing gTLD and the corresponding strings that constitute the ASCII/LD gTLD Set; its DNS service provider must also be the same for its existing gTLD and the corresponding strings within the set, though multiple DNS service providers can be used, as long as they are the same for all gTLDs within the set.

Pursuant to this rule, the LD PDP WG upholds the position that the same registry service provider must operate all delegated ASCII/LD gTLD string(s) that constitute a set at any given time. To that end, the transition to a new registry service provider must apply to the gTLD and all of its corresponding gTLDs that constitute an ASCII/LD gTLD Set at the same time.

Public Comment Review:

Final Recommendations 21 and 22 – Support as written with Minor Wording Change:

The LD PDP WG generally received support from several commenters on these recommendations as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for the LD PDP at the top-level, which is a recurring theme throughout the report.

Rationales for Final Recommendations 23-26:

Final Recommendations 23-26 remain aligned with EPDP-IDNs by adhering to the "same entity" principle, under which a gTLD and all its corresponding ASCII/LD gTLD string(s) that constitute a set must be treated and move as a set, consistent with the rationale for SubPro PDP Recommendation 25.5 that established, *"to the extent that the TLD were to change hands at any point after delegation, the variant TLDs must remain linked contractually, which should be considered a persistent requirement (e.g., this would impact gTLD registry transition procedures, including EBERO)."*[87] In support of this goal, the LD PDP WG recommends that any future ASCII gTLD along with its LD gTLD string(s), if any, that constitute a set must be subject to one Registry

[86] See details in Section 6 of Specification 10 in the Base Registry Agreement: https://itp.cdn.icann.org/en/files/registry-agreements/base-registry-agreement-12-03-2026-en.pdf#page=95

[87] See Rationale for Recommendation 25.5 in the SubPro PDP Final Report, p.115: https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115

Agreement with all gTLD strings in the set having the same SLAs and other operational requirements, as per Final Recommendation 18.

Consequently, in the event of a registry transition – including emergency back-end registry operator temporary transition process and the reassignment of a gTLD as an outcome of a Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP) determination – the LD PDP WG aligns with previous work such as SubPro and EPDP-IDNs that a gTLD and all of its corresponding ASCII/LD gTLD string(s) that constitute a set, if any, must be included in the same process and transition to the same entity at the same time.

In the same vein, the rights held by the former gTLD registry operator are also transferred to the successor. In addition, the new gTLD registry operator may apply for any new strings that the former gTLD registry operator did not apply for but could have, in accordance with Final Recommendation 1 – strings distinguished only by diacritics.

Public Comment Review:

Final Recommendations 23-26 – Support as written with Minor Wording Change:
The LD PDP WG generally received support from several commenters on these recommendations as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for the LD PDP at the top-level, which is a recurring theme throughout the report.

Rationales for Final Recommendation 27 and Implementation Guidance 28:
Data escrow requirements and procedures have been and continue to be defined in the Registry Agreement. The LD PDP WG aligns with the EPDP-IDNs Team in affirming that the current practices with regard to data escrow must be maintained for all the gTLDs that constitute an ASCII/LD gTLD Set in order to ensure the stability of the associated domain name registrations.

To facilitate the implementation of data escrow requirements in a consistent manner, the same data escrow provider must be contracted for the gTLD and its corresponding ASCII/LD gTLD string(s) that constitute a set, which are governed under a single Registry Agreement.

However, the escrow data associated with each ASCII gTLD and each LD gTLD string that constitute a set should be stored in separate files, as each string from the ASCII/LD gTLD Set represents an individual registration, particularly from a technical standpoint but also as each string within the ASCII/LD gTLD Set should be treated as a distinct gTLD in business-to-business interactions related to the Registry Agreement. The LD PDP WG also recognizes each gTLD string within the set as a distinct identifier for data escrow purposes.

Public Comment Review:

Final Recommendations 27 – Support as written:
The LD PDP WG received support from several commenters on this recommendation as written.

Implementation Guidance 28 – Support as written with Minor Wording Change:
The LD PDP WG generally received support from several commenters on this guidance as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for the LD PDP at the top-level, which is a recurring theme throughout the report.

Rationale for Final Recommendation 29:
The LD PDP WG considered Final Recommendation 7.14 from the EPDP-IDNs Phase 1 Final Report to be applicable to the ASCII/LD gTLD applications, including both new gTLD applications and any applications corresponding to an existing gTLD sought by an existing gTLD registry operator. The primary issue addressed in this recommendation concerns the restrictions related to the differential treatment and requirements applied to the non-standard types of gTLDs. Per SubPro PDP Recommendation 4.1,[88] differential treatment may apply for certain applications based on either the application type, the string type, or the applicant type. These may be subject to different application questions, evaluation processes, contractual requirements, and post-delegation activities. Here, the different application types include Community TLDs, Brand TLDs, Geographic Name TLDs, while different string types include variant TLDs and strings subject to Category 1 Safeguards.

However, during a WG meeting,[89] the GDS liaison to the LD PDP WG pointed out that Category 1 Safeguard should not be categorized under "non-standard types of gTLDs." As per the updated AGB for the New gTLD Program: 2026 Round, a specialized application – which is what is referred to as "non-standard types of gTLD" – depends on: 1) the type of applied-for string; 2) the type of applicant; and 3) the intended use of the applied-for string.[90] Here, various specialized applications include Geographic Name applications, Community applications, Brand TLD applications, IDN applications, and Variant string applications, to name a few. Category 1 Safeguard is not what is listed under this category. Rather, any applied-for string that falls into one of the four risk-based groups as a result of the Safeguard Assessment[91] will require inclusion of specific Safeguard Public Interest Commitments (Safeguard PICs) in the applicable Registry

[88] See Recommendation 4.1 in the SubPro PDP Final Report, p.24: https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=24
[89] Meeting #20: https://icann-community.atlassian.net/wiki/x/HADgGg
[90] For more details on the types of applications, see FAQ here: https://newgtldprogram.icann.org/en/resources/faqs/application-types#general-information1
[91] See Section 1.2.4.3 Safeguard Assessment, New gTLD Program: 2026 Round AGB, p.30: https://newgtldprogram.icann.org/sites/default/files/documents/new-gtld-program-2026-round-applicant-guidebook-current-en.pdf#page=30

Agreement. Pursuant to this guidance, variant TLDs and LD TLDs fall under the Category 1 Safeguard.

Accordingly, the LD PDP WG ensured that Final Recommendation 29 accurately reflected this revision made in the AGB, deviating from the original language in Final Recommendation 7.14 of the EPDP-IDNs Phase 1 Final Report. This is to clarify that while the ASCII/LD gTLD Set is subject to the Category 1 Safeguards, this restriction is not classified under "non-standard types of gTLDs." For clarity, the restriction, subject to Category 1 Safeguards, remains in effect; generally in line with EPDP-IDNs – where restrictions applied to the primary gTLD would also extend to any applied-for allocated variant TLDs upon execution of the binding Registry Agreement – all ASCII/LD gTLD strings within the entire set would likewise be subject to uniform restrictions for LD PDP.

Meanwhile, for the non-standard types of gTLDs – meaning the specialized application types such as Community TLDs, .Brand TLDs, Geographic Name TLDs – the same restrictions will apply. Thus, if an applied-for ASCII gTLD string is a .Brand TLD, any corresponding LD gTLD string sought by the applicant will be bound by the same restrictions; if these strings pass evaluations and proceed to delegation, the same restrictions become contractual obligations upon execution of the applicable Registry Agreement. As mentioned above, naturally, the same recommendation extends to any corresponding ASCII or LD gTLDs sought by an existing registry operator.

Public Comment Review:

Final Recommendation 29 – Support as written with Minor Wording Change:
The LD PDP WG generally received support from several commenters on this recommendation as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for the LD PDP at the top-level, which is a recurring theme throughout the report.

5) Topic 5: Delegation and Removal

Final Outputs:

Final Recommendation 30: Generally consistent with Final Recommendation 8.1 from the EPDP-IDNs Phase 1 Final Report,[92] no ceiling value for the number of Latin diacritic gTLD strings that constitute an ASCII/Latin Diacritic gTLD Set is necessary as economic, operational, and other factors that may impact the decision to apply for multiple Latin diacritic gTLD strings will keep the number of delegated top-level Latin diacritic strings conservative. For the LD PDP, there will be no restrictions on the number of diacritical marks applied to a single character nor the type of TLDs (e.g., real words identified in dictionaries, geographic names, brands).

Final Recommendation 31: Generally consistent with Final Recommendation 8.2[93] and Implementation Guidance 8.3[94] of the EPDP-IDNs Phase 1 Final Report, ICANN org MUST, during implementation, create a framework for developing non-binding guidelines to encourage a positive and predictable registrant experience. This MAY require a joint effort with relevant stakeholders who have experience with ASCII/Latin Diacritic gTLD Sets and variant gTLDs, where practical.

Final Recommendation 32: Consistent with Final Recommendation 8.4 from the EPDP-IDNs Phase 1 Final Report,[95] applicants for all gTLDs that constitute an ASCII/Latin Diacritic gTLD Set that pass evaluation MUST be subject to the same 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.

[92] EPDP-IDNs P1 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.

[93] EPDP-IDNs P1 Final Recommendation 8.2: In order to encourage a positive and predictable registrant experience, ICANN org must, during implementation, create a framework for developing nonbinding guidelines for the management of gTLDs and their variant labels at the top-level by registries and registrars.

[94] EPDP-IDNs P1 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.

[95] EPDP-IDNs P1 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.

Final Recommendation 33: Consistent with Final Recommendation 8.5 from the EPDP-IDNs Phase 1 Final Report,[96] the sequence for delegating the gTLDs that constitute the ASCII/Latin Diacritic Set that pass evaluation SHOULD be determined by the gTLD registry operator.

Final Recommendation 34: Consistent with Final Recommendation 8.7 from the EPDP-IDNs Phase 1 Final Report,[97] for all future versions of the RZ-LGR, Generation Panels[98] (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 ASCII/Latin Diacritic gTLD Set strings (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.

Final Recommendation 35: Consistent with Final Recommendation 8.8 from the EPDP-IDNs Phase 1 Final Report,[99] in the unexpected event where a proposed update to the RZ-LGR is unable to retain full backward compatibility for validating any delegated gTLDs and their corresponding ASCII gTLD or Latin diacritic gTLD string(s) (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.

[96] EPDP-IDNs P1 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.

[97] EPDP-IDNs P1 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.

[98] See details for "Generation Panel" and how they are maintained in the "Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels," p.20: https://www.icann.org/en/system/files/files/draft-lgr-procedure-20mar13-en.pdf

[99] EPDP-IDNs P1 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.

Implementation Guidance 36: Consistent with Implementation Guidance 8.9 of the EPDP-IDNs Phase 1 Final Report,[100] 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 corresponding ASCII gTLD or Latin diacritic gTLD string(s) (if any) to be exempted. There SHOULD also be an assessment, conducted by ICANN org, of the potential impact of exemptions on registries, registrars, registrants, and end-users, as well as proposed measures to reduce the negative impact. As part of the assessment, ICANN org SHOULD facilitate a timely dialogue between the gTLD registry operator of the exempted gTLD, relevant function(s) in ICANN org, the GP, other experts and affected parties. Notwithstanding the recommendation to exempt 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.

Final Recommendation 37: An ASCII gTLD that is removed from the root zone, either voluntarily or involuntarily, will result in the ASCII/Latin Diacritic gTLD Set no longer meeting requirements as described in Final Recommendation 1. The removed gTLD(s) SHALL NOT be available for re-assignment or selection by an entity other than the one holding the remaining IDN gTLD in the ASCII/Latin Diacritic gTLD Set for at least 10 years following the removal. The gTLD registry operator MAY retain a single IDN gTLD and SHALL no longer be considered an ASCII/Latin Diacritic gTLD Set. This recommendation reflects a departure from Final Recommendation 8.10 of the EPDP-IDNs Phase 1 Final Report.[101]

[100] EPDP-IDNs P1 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 end-users, 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.

[101] The LD PDP WG referenced EPDP-IDNs Phase 1 Final Recommendation 8.10, but adapted the requirement to better suit the ASCII/LD gTLD Set. The original EPDP-IDNs P1 Final Recommendation 8.10 language is as follows: 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.

Final Recommendation 38: A delegated Latin diacritic gTLD string that is voluntarily removed from the root zone will not require the removal of the associated ASCII gTLD or its other delegated Latin diacritic gTLD string(s). The removed Latin diacritic gTLD SHALL NOT be available for re-assignment or selection by an entity other than the one holding the remaining gTLD(s) in the ASCII/Latin Diacritic gTLD Set for at least 10 years following the removal. The gTLD registry operator MAY retain a single ASCII gTLD and SHALL no longer be considered an ASCII/Latin Diacritic gTLD Set. This recommendation reflects a departure from Final Recommendation 8.11 of the EPDP-IDNs Phase 1 Final Report.[102]

Implementation Guidance 39: Consistent with Implementation Guidance 8.12 of the EPDP-IDNs Phase 1 Final Report,[103] in the event that domain name registrations exist at the second-level under a delegated ASCII/Latin diacritic gTLD string, its gTLD 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 ASCII/Latin diacritic gTLD string.

Final Recommendation 40: Consistent with Final Recommendation 8.13 from the EPDP-IDNs Phase 1 Final Report,[104] in the event that a gTLD is removed from the root zone as a consequence of its gTLD registry operator's breach of the Registry Agreement, the rest of its ASCII/Latin Diacritic gTLD Set, if any, MUST also be removed from the root zone.

Rationales:

Rationale for Final Recommendation 30:

During the scope establishment phase, while addressing Charter Question 1 on the "what" and the "how"– circumstances under which a base ASCII gTLD and the Latin script diacritic version of the gTLD that are confusingly similar but not variants of each other may be simultaneously

[102] The LD PDP WG referenced EPDP-IDNs Phase 1 Final Recommendation 8.11, but adapted the requirement to better suit the ASCII/LD gTLD Set. The original EPDP-IDNs P1 Final Recommendation 8.11 language is as follows: 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).

[103] EPDP-IDNs P1 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.

[104] EPDP-IDNs P1 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.

delegated – the LD PDP WG determined early on that no arbitrary limits would be set regarding the application types (for existing or new), the TLD types (real words or invented words for brand naming, geographic names, etc.), the number of strings within a set (how many strings to constitute a set), or the number of diacritical marks within a letter (e.g., if more than one diacritical mark per character like ũ’, ā̈, ç̣). In essence, the conclusion was not to impose any ceiling value or restrictions, even in the case of the number of strings that constitute an ASCII/LD gTLD Set, which remained unchanged beyond the Public Comment Review period.

Variant labels defined via EPDP-IDNs also had no arbitrary ceiling or threshold set. However, evaluations are in place and fees set – allowing up to four allocatable variant labels together with the primary gTLD to incur the same base application fee as any other applicant that does not apply for variant labels in that round – to ensure alignment with the conservatism principle. Allocatable variants are also limited in scripts, which naturally place a cap. As such, EPDP-IDNs Team acknowledged that various factors such as cost, operational competence, and potential challenges would naturally lead applicants to taking a conservative approach when applying for variant labels.

For the LD PDP, while it introduces an exception process to allow for the ASCII gTLD and its corresponding LD gTLD(s) to function as a set and be simultaneously delegated, they are still considered independent. That is to say, they are not dependent on one another for their existence, nor are they contingent upon each other, except for the purpose of application, delegation, and operational coherence as a set. Moreover, although this WG has opted not to determine the application fee structure per Final Recommendations 15 and 16, it acknowledges that economic factors that burden a single gTLD registry operator may, in fact, impact the decision to apply for multiple LD gTLD strings. The description of the steps that an applicant will need to take to minimize the operational and management complexities *(set out in Final Recommendation 10)* may impose additional operational and other limits on a gTLD registry operator. These factors are expected to result in a naturally conservative number of LD gTLD string applications whereby the WG deems it unnecessary to impose any limits.

Following the Public Comment Period, however, the WG undertook a more thorough examination of adopting a more conservative approach – including potentially introducing a high-risk scenario to address potential triggers and/or adding a stricter evaluation criteria. This ultimately led to the creation of Final Recommendation 6, where the WG disallows separate ASCII gTLD and its corresponding LD applications to proceed independently.

Public Comment Review:

Final Recommendation 30 – Wording Change:

The LD PDP WG received a comment by ICANN org that this recommendation contains contextual and potentially material differences from EPDP-IDNs, which subsequently should not be deemed "consistent" and updated accordingly. The WG responded that even though there may be inconsistency in the language and minor details, the underlying intent and behavior are consistent with EPDP-IDNs. Accordingly, the WG decided to update it to *"generally consistent,"* while noting the difference by adding *"for LD PDP."*

During the Public Comment Review period, the WG engaged in extensive discussions on this topic and conducted a more thorough examination of the recommendation to consider adopting a more conservative approach – including potentially introducing a high-risk scenario to address potential triggers and/or adding a stricter evaluation criteria. In conclusion, the WG agreed to maintain Final Recommendation 30 as-is but introduce a new recommendation *(Final Recommendation 6[105])* that disallows separate ASCII gTLD and its corresponding LD gTLD applications to proceed independently, where the gTLDs related to the LD PDP can only proceed as a set.

Meanwhile, there was another minor wording update to the policy language, revising it to *"string(s)"* from "label(s)" for LD PDP at the top-level, which is a recurring theme throughout the report.

Rationale for Final Recommendation 31:

The LD PDP WG agreed with the EPDP-IDNs Team that it would be valuable to develop non-binding guidelines for the management of the gTLDs in the ASCII/LD gTLD Sets at the top-level by registries and registrars. This aims to address any unintended consequences of Final Recommendation 30, as well as to address any concerns that may arise from the lack of a common approach by registries and registrars in managing such gTLDs, which may result in a less than optimal experience for registrants. The WG anticipates that such guidelines would ultimately encourage a positive and predictable registrant experience.

The LD PDP WG upheld the notion from the EPDP-IDNs Team that ICANN org must create the framework for developing the guidelines during implementation, and that framework be subject to Public Comment as part of the policy implementation process. In addition, the LD PDP WG emphasized that the future guidelines should be developed with the help of relevant

[105] LD PDP Final Recommendation 6: The String Similarity Evaluation Panel should not permit any ASCII gTLD and its corresponding Latin diacritic gTLDs to proceed independently through separate applications; such gTLDs may only proceed and be delegated as an ASCII/Latin Diacritic gTLD Set by a single entity. Potential applications where an ASCII gTLD or Latin diacritic gTLD(s) correspond(s) to their existing gTLD can still be applied-for by the same entity as an ASCII/Latin Diacritic gTLD Set per Final Recommendation 3. For the avoidance of doubt, the pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement. No new applications shall be permitted for those existing gTLDs that continue to be operated under different entities.

stakeholders, such as registries, registrars, and where feasible, registrants that have experience in IDNs, variant labels, and the ASCII/LD gTLD Sets. ICANN org will be responsible for deciding how to disseminate the non-binding guidelines in the future.

To clarify, the main purpose of the framework is to define the scope and outline the steps involved in developing the guidelines for the operation of gTLDs in the ASCII/LD gTLD Sets by registries and registrars. The LD PDP WG acknowledges that because this exception is currently not allowed, it will be hard to fully understand the user experience until they are delegated. As such, actual guidelines are expected to be developed after a number of gTLD strings have been delegated. Consequently, the framework could also include provisions for potential research or case studies of user experiences related to such gTLD strings.

Public Comment Review:

Final Recommendation 31 – Introduction of New Policy:

In response to ICANN org's Public Comment – which requested the addition of policy language that addresses a joint effort process and/or developing guidelines involving relevant stakeholders with experience in ASCII/LD Sets – particularly to mirror EPDP-IDNs P1 Final Recommendation 8.2 and Implementation Guidance 8.3, the WG agreed to provide such guidance to help benefit the LD PDP. However, the two Outputs from the EPDP-IDNs were not incorporated verbatim; rather, they were consolidated into a single recommendation to serve the purpose of LD PDP and be broad enough to apply across a range of situations.

Rationales for Preliminary Recommendations 32-33:

Affirmation 40.2 in the SubPro Final Report[106] supports maintaining the timeframe outlined in the Base Registry Agreement; specifically that gTLD registry operators must complete all the required testing procedures for delegating the gTLD into the root zone within 12 months of the Effective Date of the Registry Agreement. In addition, SubPro PDP affirmed that the gTLD registry operators may request an extension of up to 12 additional months for delegation. This is also reflected in the Base Registry Agreement under 'Delegation Testing' (Article 2, Section 2.20).

The LD PDP WG remains aligned with the EPDP-IDNs Team and the SubPro PDP recommendations, which require that each applied-for gTLD string and its corresponding ASCII and/or LD gTLD string(s) that constitute a set – and pass evaluation – be delegated within the said 12 month timeframe, with the possibility of an extension of up to 12 additional months. This is based upon the understanding that all applied-for gTLDs that constitute an ASCII/LD gTLD Set should be delegated at or about the same time to ensure an optimal user experience. Per Final

[106] See Affirmation 40.2 in the SubPro PDP Final Report, page 191: https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=191

Recommendation 18 – where all gTLD strings within the ASCII/LD gTLD Set that pass evaluation are governed by one Registry Agreement – it seems reasonable for these strings to abide by the same delegation timeframe. Deviating from this approach could contradict the SubPro PDP recommendations and create unnecessary complexity.

With regard to the sequence in which the ASCII gTLD and LD gTLD string(s) that pass evaluation should be delegated, the LD PDP WG determined that this is not a matter for ASCII/LD gTLD Sets nor of any policy concern. In the absence of security or stability risks – and considering that all these strings are regarded as individual gTLD entries into the root zone – the LD PDP WG agreed that the delegation order does not matter for LD PDP nor require policy enforcement. Instead, this should be left to the discretion of gTLD registry operators, based on their business priorities and the details provided in their applications. That said, all strings must be delegated within the required timeframe or within any extended timeframe granted by ICANN org as stipulated in the Registry Agreement.

Public Comment Review:

Final Recommendations 32 and 33 – Support as written:

The LD PDP WG received support from several commenters on this recommendation as written.

Rationales for Final Recommendations 34-35 and Implementation Guidance 36:

The LD PDP WG had an in-depth discussion on how to proceed with Final Recommendation 8.7 from the EPDP-IDNs Phase 1 Final Report, and apply to LD PDP, related to retaining full backward compatibility. The main questions raised were: 1) what does full backward compatibility mean in the context of the allocated and delegated ASCII/LD gTLD Set strings; and 2) does the LD PDP need to provide an additional recommendation beyond what was already established and will be determined through EPDP-IDNs?

First, to better understand the meaning of "full backward compatibility" in the context of this LD PDP and ASCII/LD gTLD Set, if the GP decides to update the LGR Procedure[107] along with an update to the RZ-LGR, such updates may prevent certain characters and gTLDs from co-existing. As a result, the gTLDs that constitute an ASCII/LD gTLD Set may no longer be able to co-exist, let alone constitute a valid set.

Currently, the LGR defines which characters are permitted and which variant relationships may be added. As for LD PDP, variants are out of scope. For instance, a and á per RZ-LGR for Latin scripts are blocked variants; these blocked variants are not eligible for allocation and therefore cannot exist within the ASCII/LD gTLD Set. However, e and é are not defined as variants under

[107] See LGR Procedure on wiki here: https://icann-community.atlassian.net/wiki/x/CICxBQ

the current version of the RZ-LGR,[108] and gTLDs with these characters can apply under this LD PDP process. Yet if, in the future, the Latin GP revises these characters to become variants – specifically blocked variants and not allocatable ones, which is likely given that most variants in the Latin script are not made allocatable – then the corresponding strings will likely no longer be allowed to co-exist or constitute an ASCII/LD gTLD Set. In this sense, under the "full backward compatibility" principle, future GPs will need to be mindful of this issue where existing cases may conflict with the newly updated rules, and resolving such cases may require new solutions to maintain full backward compatibility.

Second, in the context of providing additional guidance through LD PDP on this matter, it was noted that the current language in Final Recommendation 8.7 from EPDP-IDNs Phase 1 Final Report may already address the ASCII/LD gTLD Set strings. The LGR Procedure requires GPs and the IP to adhere to the stability principle and to make best efforts to retain full backward compatibility with delegated gTLDs. In this case, the issue extends to all gTLDs and is not unique to LD PDP.

Even if those strings in question were to exist as stand-alone domains, the same problem would arise under the new RZ-LGR and they would not be permitted to co-exist. Thus, there is nothing new or specific that needs to be redefined or added through LD PDP, as the necessary provisions have already been put into place via EPDP-IDNs. Regardless of whether the strings exist individually or as part of a set – in this case, an ASCII/LD gTLD Set – any future changes must ensure that they remain viable through the exemption process.

To unpack this issue, the LD PDP WG affirmed the intent established through Final Recommendations 8.7-8.8 and Implementation Guidance 8.9 in the EPDP-IDNs Phase 1 Final Report. In essence, future updates to the RZ-LGR should aim to maintain full backward compatibility with existing delegated gTLDs as well as allocated and delegated ASCII/LD gTLD Set string(s) in order to preserve root zone stability. While the likelihood of incompatibility is considered low due to built-in safeguards, the WG emphasized that the GPs and IP should make best efforts to uphold this standard.

The LD PDP WG also encourages ICANN org to share these recommendations with the GPs and IP. As noted above, in cases where backward compatibility cannot be maintained – particularly due to non-variant strings that have already been delegated and operate as an ASCII/LD gTLD Set – those affected gTLDs and their corresponding ASCII/LD gTLD strings that constitute the sets should be exempted. This would allow for a continued operation of the delegated gTLDs upon the identification of potential security and stability risks. To that end, the LD PDP WG also agrees with the EPDP-IDNs Team that the LGR Procedure be updated to explicitly enumerate such exceptional circumstances to the extent known to the GPs and IP, while acknowledging that it

[108] Current version of the RZ-LGR for the Latin Script – Version 5: https://www.icann.org/sites/default/files/lgr/rz-lgr-5-latin-script-26may22-en.html

may not be possible to identify all potential circumstances that could render full backward compatibility unretainable. While recognizing that GPs and IP are not bound by policy obligations, they are encouraged to take these recommendations into serious consideration.

A point worth noting is that exemptions should apply to the delegated gTLD and the corresponding ASCII/LD gTLD string(s) that constitute the set, while any new LD gTLD string(s) must comply with the updated RZ-LGR. This is foreseen in the LGR Procedure, which states that: *"While existing labels will almost certainly have to be grandfathered*[109] *if they are in conflict with the label generation rules established by this procedure, that precedent and conflict is not a reason to invalidate any aspect of the new rules or this procedure."*[110] Grandfathered – exempted – in this instance means that the proposed RZ-LGR update will apply to future new gTLDs and will not be retroactive. The gTLD registry operator will be able to continue to operate the affected gTLD and its allocated and delegated gTLD strings (if any). However, the gTLD registry operator will not be allowed to apply for any additional strings unless they are deemed valid and allocatable according to the updated version of the RZ-LGR.

The LD PDP WG further agrees with the EPDP-IDNs Team that any such exemptions be transparently documented during the Public Comment period. Here, an analysis of associated risks and proposed mitigation strategies should be accompanied. ICANN org should facilitate impact assessments on gTLD registry operators and end-users to ensure transparency and community input.

In addition, to address some WG members' requests for clarification regarding GPs and how they are maintained, a footnote has been added to the recommendation, outlining how GPs are maintained in accordance with the "Procedure to Develop and Maintain the Label General Rules for the Root Zone in Respect of IDNA Labels."

Public Comment Review:

Final Recommendation 34 – Support as written with Wording Change:

The LD PDP WG generally received support from several commenters on this recommendation as written. A minor wording update to the policy language was the revision to *"string(s)"* from "label(s)" for LD PDP at the top-level, which is a recurring theme throughout the report.

Another wording change through the Public Comment Review period is the removal of the phrase, *"their delegated and allocated variant labels (if any)*," which pertains to EPDP-IDNs and

[109] This term has and will continue to be referred as "exempted" per EPDP-IDNs Phase 2 Final Report. See definition and details under the "exempted" entry in "Section 3. Glossary."
[110] See Section A.3.5 of the Root Zone IDNA Label LGR Development and Maintenance, p.10: https://www.icann.org/en/system/files/files/draft-lgr-procedure-20mar13-en.pdf#page=10

needed updates applicable to LD PDP. The updated and applicable clause, *"and their delegated and allocated ASCII/Latin Diacritic gTLD Set strings (if any)"* remains.

Final Recommendation 35 and Implementation Guidance 36 – Support as written with Minor Wording Change:

The LD PDP WG generally received support from several commenters on these Outputs as written. A minor wording update to the policy language was the revision to *"string(s)"* from *"label(s)"* for LD PDP at the top-level, which is a recurring theme throughout the report.

Rationales for Final Recommendations 37-38, 40 and Implementation Guidance 39:

Consistent with Final Recommendations 8.10-8.11, 8.13 and Implementation Guidance 8.12 of the EPDP-IDNs Phase 1 Final Report, the LD PDP WG recognized that under various circumstances, a delegated ASCII gTLD and/or its corresponding LD gTLD string(s) may be removed from the root zone. Therefore, Final Recommendations 37-38, 40 and Implementation Guidance 39 were developed accordingly to include robust safeguards to help ensure a secure and stable operation of the Internet's unique identifier systems. The language used in these Outputs referenced EPDP-IDNs; however, it required an adaptation to reflect the current agreements, the envisioned status of the ASCII/LD gTLD Sets, thereby recognizing the departure from EPDP-IDNs.

It is important to emphasize here that the delegation and removal rules were not designed to actively promote the removal of TLDs from the root zone or to ensure that only a single TLD remains. Rather, they were developed in recognition of the fact that, under certain scenarios, a delegated TLD may be removed from the root zone, as previously mentioned. In such cases, it was prudent for the WG to define the conditions under which this could occur, following the scenarios mentioned in the EPDP-IDNs.

While it agreed with EPDP-IDNs and remained committed to the established rules for the Variant Set, it explored all hypothetical scenarios for the LD PDP itself and considered how these might impact any security issues and/or policy coherence, which ultimately resolved any outstanding issues in order to stabilize the language. Two key questions guided the discussion: 1) Are LD applicants able to voluntarily remove TLDs and if so, under which conditions?; and 2) If possible, what provisions are necessary for the removal of TLDs from the set? Some issues to consider were whether a gTLD registry operator could remove a TLD within the set, without going to EBERO; what kind of processes would be required to remove an ASCII gTLD or LD gTLD(s) from both the set as well as the root zone; and how would the LD PDP policy align with the EPDP-IDNs policy? When answering the two key questions, the LD PDP WG had to further consider whether it would be acceptable for an ASCII gTLD or a LD gTLD to remain under the current LD PDP, if the corresponding gTLD(s) were removed.

In addressing the first question, the LD PDP WG was reminded that under the relevant LD PDP policy recommendations, all gTLDs within the set, though treated as a unified ASCII/LD gTLD Set, remain individually delegated and are independent of one another.[111] In other words, the TLDs within the set are not inherently related, like the variant TLDs through EPDP-IDNs, and are arbitrarily grouped through this process, only formalized through the ICANN Registry Agreement. Thus, once a TLD is removed from both the set and the associated Registry Agreement, it becomes independent and no binding relationship remains. Consequently, the LD PDP WG found no compelling reason to prohibit such removals, even if this indicated the dissolution of the set. As noted in Final Recommendation 1, the presence of a base ASCII gTLD is essential for the existence of the set and if removed from the root zone, the set ceases to exist.

For the second question – what provisions are necessary for the removal of TLDs within the set – EPDP-IDNs did not require such recommendations, as the LGR ensures that all the variant TLDs are inherently tied to the primary TLDs and are managed by a single entity, as mentioned before. Since this was not the case for LD PDP, the WG had to consider what, then, should happen with TLDs that have at some point been a part of the ASCII/LD gTLD Set but are no longer part of the set? To address this, the LD PDP WG revisited previous work and examined existing contracts for guidance.

In the Final Report ccNSO PDP4 (de-)selection of IDNccTLDs, there is a section on "Specific requirement following the retirement of the selected IDNccTLD string" which stipulates that *"Following the conclusion of its retirement process a selected IDNccTLD string is removed from the DNS, the selected IDNccTLD string shall not be available for re-assignment or selection for at least 10 years following the removal."*[112] Meanwhile, in ICANN's Registry Agreement – Specification 13 – on .Brand TLD Provisions, it stipulates that *"ICANN may not delegate the TLD to a successor registry operator for a period of two (2) years following the expiration date without registry operator's consent…"*[113] Subsequently, the WG determined that a similar condition should apply to the LD PDP – specifically for the TLDs that are removed from the root zone.

Accordingly, the WG evaluated options ranging from 2 to 10 years, ultimately selecting the longer period of 10 years to ensure greater stability and safeguard against potential security issues. It recognized that the establishment of an appropriate duration for reassignment or selection for those entities other than the ones in charge of the set would resolve pertaining concerns. This approach, then, would also resolve the case of retaining a single gTLD – whether

[111] This principle is reiterated throughout the report, especially outlined in the rationales of Final Recommendations 1, 15-16, and 30 when dealing with applications, fees, and their management.
[112] See Section 2.2.2 of the Final Report ccNSO PDP4 (de-)selection of IDNccTLDs at https://ccnso.icann.org/sites/default/files/field-attached/ccpdp4-final-report-23feb24-en.pdf#page=20
[113] See p.104 of ICANN's Registry Agreement at https://itp.cdn.icann.org/en/files/registry-agreements/base-registry-agreement-12-03-2026-en.pdf#page=104.

an ASCII gTLD or a LD gTLD – despite the set having dissolved under the current LD PDP. The WG affirmed that as long as it is done with due diligence and all stakeholders – registries, registrars, registrants – are taken into consideration, retaining a single TLD should not be a problem.

In short, both ASCII gTLD and LD gTLD(s) could be removed from the root zone; and if a single or no corresponding gTLD remains in the set, the set ceases to exist. The removed gTLD(s) shall not be available for re-assignment or selection by any entity other than the one holding the remaining gTLD(s) in the ASCII/LD gTLD Set for at least 10 years following the removal. Accordingly, the gTLD registry operator may retain a single ASCII gTLD or an LD gTLD, even though the set is no longer viable. If the entire set is removed from the RZ, it shall be set aside pending re-assignment to avoid any confusion for registrants and end-users. For the avoidance of doubt, re-assignment shall not be required for a set that is intact, solely due to its transition to an EBERO, since the responsibility of the set shall transfer to EBERO and no gTLD from the set shall be allocated to any new entity in accordance with Final Recommendation 25. All relevant footnotes explaining these requirements and provisions were inserted and incorporated into Final Recommendations 1, 37, and 38.

These provisions also clarify and distinguish those exempted cases outlined in Final Recommendations 6 and 7. Any outcome resulting from Recommendations 37 and 38 should not affect other existing diacritics already managed by different entities, which remain protected by the exemption clause in Final Recommendation 6, *"pre-existing independent gTLDs that are managed by different gTLD registry operators are exempted from this requirement."* That said, pursuant to Final Recommendations 7, 37, and 38, where either none or only a single gTLD remains, such that no additional sets are present and the applicable cool-off period has expired, the playing field is effectively reset. In such circumstances, any gTLD registry operators may apply for, manage, and operate any gTLDs to constitute an ASCII/LD gTLD Set, per Final Recommendations 3-6.

Consistent with Implementation Guidance 8.12 from the EPDP-IDNs Phase 1 Final Report, a gTLD registry operator may request the removal of a delegated ASCII/LD gTLD string for which domain name registrations exist under that gTLD. This is provided that the registry operator justifies the decision and submits a transition plan for ICANN org's review regarding those existing registrations under the delegated ASCII/LD gTLD string that it intends to remove. Considering the potential complexities introduced by removing a domain name at the second-level that has third-party registrations as well as other delegated gTLDs from the same Variant Set, requiring ICANN org's review of the transition plan should ensure that robust safeguards are in place for registrants, thereby maintaining consumer trust in the DNS.

Meanwhile, consistent with EPDP-IDNs, in the event a string – whether an ASCII gTLD or an LD gTLD string from a set – is removed from the root zone as a consequence of its registry operator's breach of the Registry Agreement, the rest of the gTLD(s) that constitute the set must

also be removed from the root zone. The LD PDP WG debated whether retaining a single gTLD should be permitted in such cases, acknowledging that a breach of the Registry Agreement does not always result in the removal of a delegated gTLD from the root zone. However, the WG concluded that in the event of a breach, ICANN org would need to evaluate the consequences as well as the impact of a potential removal and obviously, take appropriate action. For example, this could include triggering the emergency transition of the gTLD to an EBERO, which requires the inclusion of all the corresponding ASCII/LD gTLD strings that constitute the set, per Final Recommendation 25. To ensure clarity, the re-assignment period shall not apply in such circumstances, as no gTLD has been removed from the RZ-LGR and the set is still intact, given that it is under transition to and supervision by the EBERO. In conclusion, Final Recommendation 40 aligned with Final Recommendation 8.13 from the EPDP-IDNs Phase 1 Final Report.

Public Comment Review:

Final Recommendations 37 and 38 – Wording Change:

Since these recommendations contain contextual and material differences from the corresponding EPDP-IDNs recommendations, the LD PDP WG was requested by ICANN org to highlight this change. Accordingly, the WG added a sentence to reflect the departure from EPDP-IDNs, as follows: *"This recommendation reflects a departure from Final Recommendation…"*

Regarding the question on how the reassignment period would work during an emergency transition to an EBERO, the WG provided further clarity through the rationale, explaining that when transitioning to an EBERO, reassignment period would not apply as the whole set is still intact and no TLD from the set shall be removed from the root zone or allocated to a new entity.

Implementation Guidance 39 and Final Recommendation 40 – Support as written:

The LD PDP WG generally received support from several commenters on these Outputs.

6) Topic 6: Requirements for the Set at the Second-level

Final Outputs:

Final Recommendation 41: Building on an ASCII/Latin Diacritic gTLD Set as defined in Final Recommendation 1, an ASCII/Latin Diacritic Domain Set is defined to include:
41.1 a second-level label and all its variants within a given TLD, as determined by the second-level LGRs for that given TLD;
41.2 all second-level labels from 41.1 under all other TLDs, if they are valid as determined by the second-level LGRs for those TLDs;
41.3 all variants of all second-level labels from 41.2, as determined by the respective second-level LGRs for those TLDs.

The criteria and requirements applicable to the second-level LGRs for the gTLD registry operators that manage the ASCII/Latin Diacritic gTLD Sets are outlined in Final Recommendation 42.

Final Recommendation 42: ICANN org SHOULD create a set of second-level LGRs that serve as a template and minimum requirement for gTLD registry operators managing an ASCII/Latin Diacritic gTLD Set. These LGRs SHOULD include the diacritized versions of the ASCII letters from the list of eligible characters determined in Final Recommendation 1.2 as blocked variants of the corresponding ASCII letters, and additionally include the impact of this change on other variant sets. These LGRs SHOULD be developed using the reference LGRs as starting points. As with any second-level reference LGR, gTLD registry operators MAY adapt this to their needs by adjusting the repertoire, adding more variant relationships, or changing the disposition of variant relationships to support their targeted user-community. These OPTIONAL changes will still need to be reviewed based on the applicable processes already in place (or as updated) by ICANN org.

Rationale:

Rationales for Final Recommendations 41 and 42:

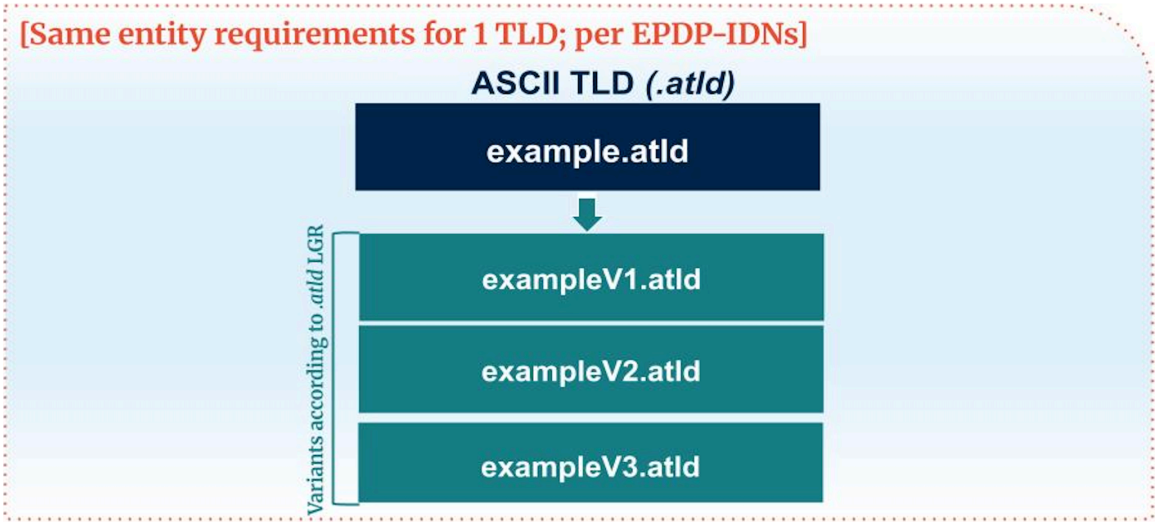
From this Topic (Topic 6), the LD PDP WG established rules for the second-level, following the sequence as outlined in EPDP-IDNs Phase 2. The first task was for the WG to define the same entity requirements at the second-level, applying Final Recommendation 1 of the EPDP-IDNs Phase 2 Final Report to LD PDP, which are formalized in Final Recommendation 43. During the process, the WG recognized that the ASCII/LD Set at the second-level also needed to be clearly defined, similar to and building on the approach taken in Final Recommendation 1; this led to

the introduction of the "ASCII/Latin Diacritic Domain Set." This process also contributed to the WG addressing Charter Question 1 at the second-level.[114]

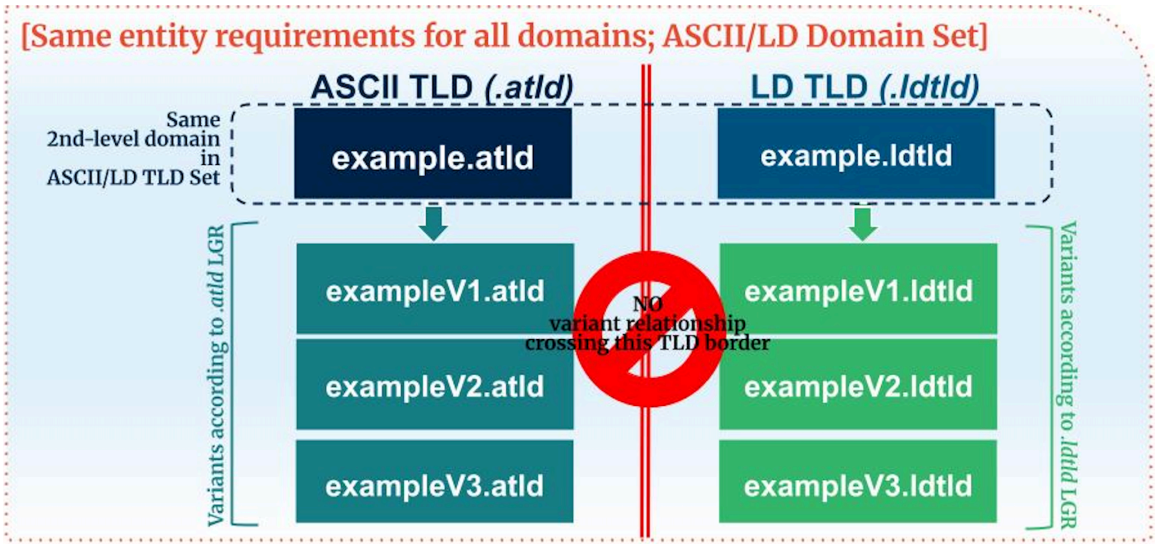
Per EPDP-IDNs Phase 2, the second-level had to account for variants at the second-level, in accordance with the LGR and the principles of Variant Set determination. [Figure 1] below illustrates the definition of ASCII/LD Domain Sets, outlining their eligibility and requirements, as well as the role of variants in this context.

[Figure 1] Understanding the ASCII/Latin Diacritic Domain Set

- **Diagram 1**

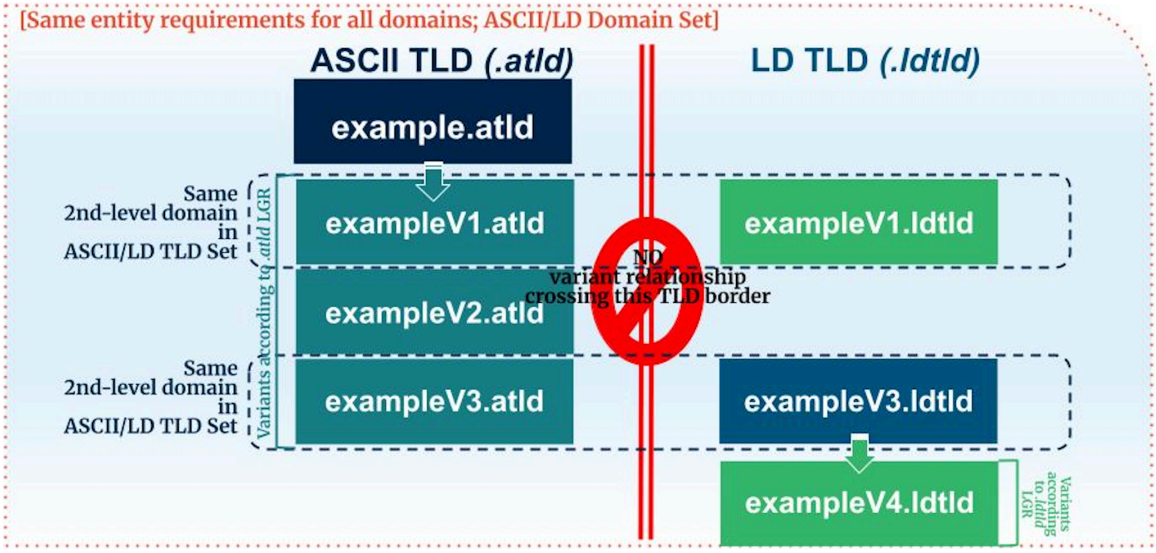


- **Diagram 2**



[114] Here, the WG again responds to the "what" aspect of Charter Question 1 regarding when such confusingly similar, non-variant gTLDs may be simultaneously delegated.

- **Diagram 3**



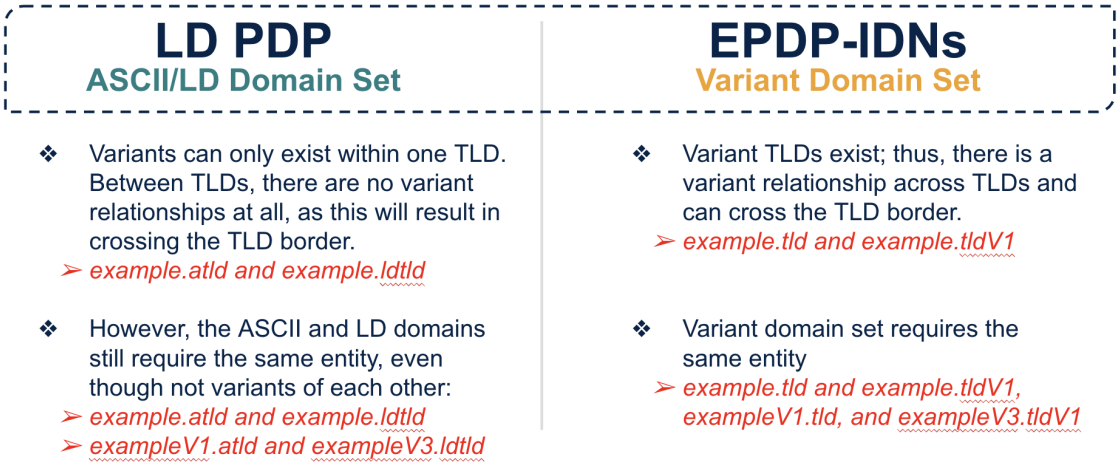
As shown in [Figure 1], there is essentially no variant relationship at the top-level between the TLDs. It demonstrates through the red line and the ban depicted in the middle of the second and third diagrams that at the TLD level, boundaries are not crossed – variant relationships at the second-level are confined within a single TLD. This marks a key difference from EPDP-IDNs, where Variant Sets could span across TLDs. For example, when dealing with variant second-level labels – V1, V2, V3 – and TLDs that constitute the ASCII/LD gTLD Set as defined by the LD PDP – ATLD, LDTLD1, LDTLD2, all of the following domains are reserved for the same entity: V1.ATLD, V2.ATLD, V3.ATLD and V1.LDTLD1, V2.LDTLD1, V3.LDTLD1 and V1LDTLD2, V2.LDTLD2, V3.LDTLD3. However, V1.ATLD has no variant relationship with V1.LDTLD1 under the LD PDP. In EPDP-IDNs, the TLDs themselves could be variants of one another and consequently, V1.TLDV1 would be a variant of V1.TLDV2. Therefore, the term “variants” and its usage needed to take on a broader meaning when considering the same entity requirements across TLDs for LD PDP, which resulted in an extensive discussion within the WG, even beyond the Public Comment period.

To specify, Diagram 1 in [Figure 1] presents the simple case of a stand-alone TLD. The registered domain (example.atld) generates three variants according to that TLD's specific LGR (exampleV1.atld, exampleV2.atld, exampleV3.atld). This serves as a starting point for two examples with LD TLDs. Diagram 2 depicts the scenario where the LGRs for both the ASCII gTLD (.atld) and the LD TLD (.ldtld) produce the same set of variant labels. Diagram 3 depicts the scenario where the LGRs for the ASCII gTLD (.atld) and the LD TLD (.ldtld) do not produce the same set of variant labels, although the LGRs are still harmonized. The WG agreed that in both scenarios, the domain names in the ASCII/LD Domain Set, as defined in Final Recommendation 41, must be allocated to or withheld for the same entity, per Final Recommendation 43. This WG determination was made in full recognition that, as noted above, there is no variant relationship at the top-level.

As described above, Diagram 3 illustrates that based upon the specific LGR for each TLD, the variant labels may not be uniform. Here, those additional labels under .ldtld must be invalid in the ASCII gTLD (.atld), or they would have already been part of its Variant Set (due to the fact that the LGRs need to be harmonized). The blue shades in all three diagrams (example.atld, example.ldtld, and exampleV3.ldtld) represent the first domain activated under the respective TLD, also known as the *"source domain name,"* which is introduced in more detail through Final Recommendation 48. As Diagram 3 of [Figure 1] suggests, the WG found that there may also be situations in which a source domain that is valid in one TLD is not valid in another (here example.ldtld is not a valid domain). Accordingly, the source domain name itself may differ per TLD in accordance with the ASCII/LD Domain Set. The green shades in all three diagrams (exampleV1.atld, exampleV2.atld, exampleV3.atld, exampleV1.ldtld, exampleV2.ldtld, exampleV3.ldtld, and exampleV4.ldtld) represent all the valid variants that can be generated under the ASCII/LD Domain Set. To avoid user confusion, the same entity principle must apply to all domains within an ASCII/LD Domain Set *(See details in the rationale for Final Recommendation 43)*.

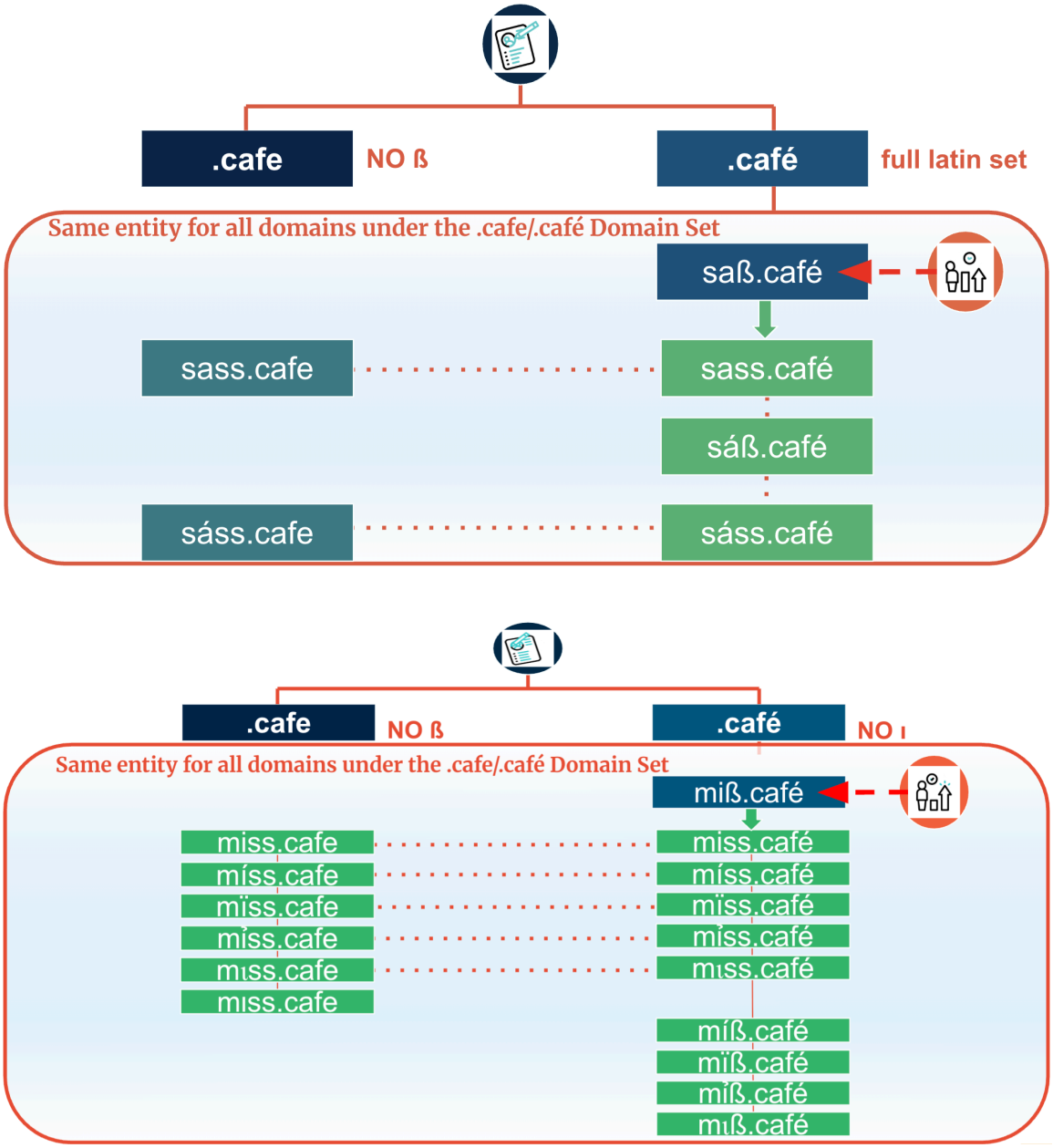
To enhance understanding, the definition of an ASCII/LD Domain Set – and how it differs from the EPDP-IDNs Variant Set – is compared in more detail below in [Figure 2].

[Figure 2] LD PDP vs. EPDP-IDNs at the Second-level



[Figure 3] below presents hypothetical examples of ASCII/LD Domain Sets to further illustrate which domains fall within the scope of the sets and under the same entity principle.

[Figure 3] Examples of ASCII/Latin Diacritic Domain Sets



Considering all this, the ASCII/LD Domain Set is defined to contain, as outlined in Final Recommendation 41: 1) a second-level label and all its variants within a given TLD, as determined by the second-level LGRs for that given TLD; 2) all second-level labels from 1) under all other TLDs, if they are valid as determined by the second-level LGRs for those TLDs; 3) all variants of all second-level labels from 2), as determined by the respective second-level LGRs for those TLDs. To ensure clarity, the term "label" here refers specifically to second-level labels, which will now be used through Topics 6-8 pertaining to the ASCII/LD Domain Sets.

Final Recommendation 42 is newly introduced in the Final Report to outline the criteria and requirements applicable to the second-level LGRs for the gTLD registry operators that manage the ASCII/LD Domain Sets. For the second-level, ICANN org should create such templates, including the diacritized versions of the ASCII letters from the list of eligible characters determined in Final Recommendation 1.2. The inclusion of such diacritics in the second-level LGR benefits all involved parties and ensures that – registries, registrars, registrants – have a conservative baseline to implement the second-level LGR, with optional changes, if any, to be reviewed and considered by ICANN org.

Public Comment Review:

Final Recommendation 41 – Significant Change with an Introduction to a New Recommendation – Final Recommendation 42:

This recommendation called for reassessment to determine whether the definition remained aligned with the conservatism principle and whether sufficient measures were in place to ensure security and stability of the DNS, similar to Final Recommendation 1. This led to extensive discussions, resulting in significant changes within the policy language and intent, including an introduction of pertinent criteria and requirements for the second-level and the ASCII/LD Domain Sets as outlined under a new recommendation – Final Recommendation 42. The updated language can be found in Final Recommendations 41 and 42.

In addition, ICANN org requested the WG to align the definition of the ASCII/LD Domain Sets with the ASCII/LD gTLD Sets, especially for the same entity principle to be applied consistently for a more predictable and consistent user experience across the DNS. The WG took note of this request and subsequently updated the relevant rules to address these concerns, as detailed under the rationale for Final Recommendation 43.

The WG was also asked to provide explanatory text to [Figure 3] (now [Figure 1]) to assist readers who may be unfamiliar with the deliberations concerning the ASCII/LD Domain Set. This request especially called for description of colors, arrows, as well as illustrative examples. These elements have all been incorporated through the introduction of Figures 1-3.

With respect to the term, *"label,"* the policy language explicitly specifies *"second-level."*

Finally, the WG recognized the risk of potential confusion if not well-defined and acknowledged the importance of clear definitions, understanding, and transparency related to the ASCII/LD Domain Sets, as outlined in Final Recommendations 41-42, 43, and Implementation Guidance 44. The WG has sought to address this through detailed explanations throughout the report and will also seek to reinforce this understanding through future outreach.

7) Topic 7: "Same Entity" Principle at the Second-level and IDN Table Harmonization

Final Outputs:

Final Recommendation 43: Consistent with Final Recommendation 1 from the EPDP-IDNs Phase 2 Final Report,[115] the "same entity" principle applies to the ASCII/Latin Diacritic Domain Set per Final Recommendation 41. This means that all allocatable domain names of an ASCII/Latin Diacritic Domain Set MUST be allocated or withheld for possible allocation only to the same registrant. Additionally, all allocated domain names MUST be at the same sponsoring registrar.

Implementation Guidance 44: Generally consistent with Implementation Guidance 2 from the EPDP-IDNs Phase 2 Final Report,[116] gTLD registry operators SHOULD take into account Recommendation 14 in SAC060, as well as language or script communities' widely acceptable practices among Internet users and established conventions, and consider setting a maximum number of allocatable domain names that can be allocated to the same registrant within the ASCII/Latin Diacritic Domain Set.

Final Recommendation 45: Generally consistent with Final Recommendation 3 from the EPDP-IDNs Phase 2 Final Report,[117] immediately prior to the policy effective date of the "same entity" principle as set out in Final Recommendation 43, the existing variant domain names that do not conform to the "same entity" principle MUST be exempted. Furthermore, where the exempted ASCII and its corresponding Latin

[115] EPDP-IDNs P2 Final Recommendation 1: The "same entity" principle applies to the allocation of future variant domain names at the second-level of gTLDs. This means that all allocatable variant domain names from a variant domain set must be allocated or withheld for possible allocation only to the same registrant. Additionally, all allocated domain names must be at the same sponsoring registrar.
[116] EPDP-IDNs P2 Implementation Guidance 2: gTLD registry operators should take into account Recommendation 14 in SAC060, as well as language or script communities' widely acceptable practices among Internet users and established conventions, and consider: 2.1 setting a maximum number of allocatable variant domain names that can be allocated to the same registrant of the source domain name; and 2.2 limiting automatic activation of variant domain names to the extent possible, including in instances where the language-script community believes automatic allocation and activation is needed.
[117] EPDP-IDNs P2 Final Recommendation 3: Immediately prior to the policy effective date of the "same entity" principle as set out in Final Recommendation 1, the existing variant domain names that do not conform to the "same entity" principle must be exempted. This means that there will be no change to the contractual or allocation status of such existing variant domain names. The requirement of having the same registrant and the same sponsoring registrar will not be applied retroactively. gTLD registries must determine variant sets for each exempted label as if it is a source domain name and protect from registration all variant labels in all such variant sets in all variant gTLDs, as appropriate.

diacritic gTLD(s) are converted into an ASCII/Latin Diacritic gTLD Set in accordance with Final Recommendation 7, any existing second-level domain names that do not conform to the "same entity" principle MUST be exempted. This means that there will be no change to the contractual or allocation status of such existing domain names. The requirement of having the same registrant and the same sponsoring registrar will not be applied retroactively. The gTLD registries operating an ASCII/Latin Diacritic gTLD Set MUST determine ASCII/Latin Diacritic Domain Sets for each exempted label and protect from registration all labels in all such ASCII/Latin Diacritic Domain Sets, as appropriate.

Final Recommendation 46: Consistent with Final Recommendation 4 from the EPDP-IDNs Phase 2 Final Report,[118] any allocatable domain name of an ASCII/Latin Diacritic Domain Set containing exempted domain names pursuant to Final Recommendation 45 cannot be allocated unless and until only one registrant and one sponsoring registrar remain for the exempted domain name(s) in the ASCII/Latin Diacritic Domain Set.

Final Recommendation 47: Consistent with Final Recommendation 5 from the EPDP-IDNs Phase 2 Final Report,[119] all of the existing and future IDN Tables for a given ASCII/Latin Diacritic gTLD Set, if any, MUST be harmonized. This means that all of the IDN Tables for an ASCII gTLD and its corresponding Latin diacritic gTLD(s) MUST produce a consistent variant domain set for a given second-level label registered under that ASCII gTLD or its corresponding Latin diacritic gTLD string(s).

Rationales:

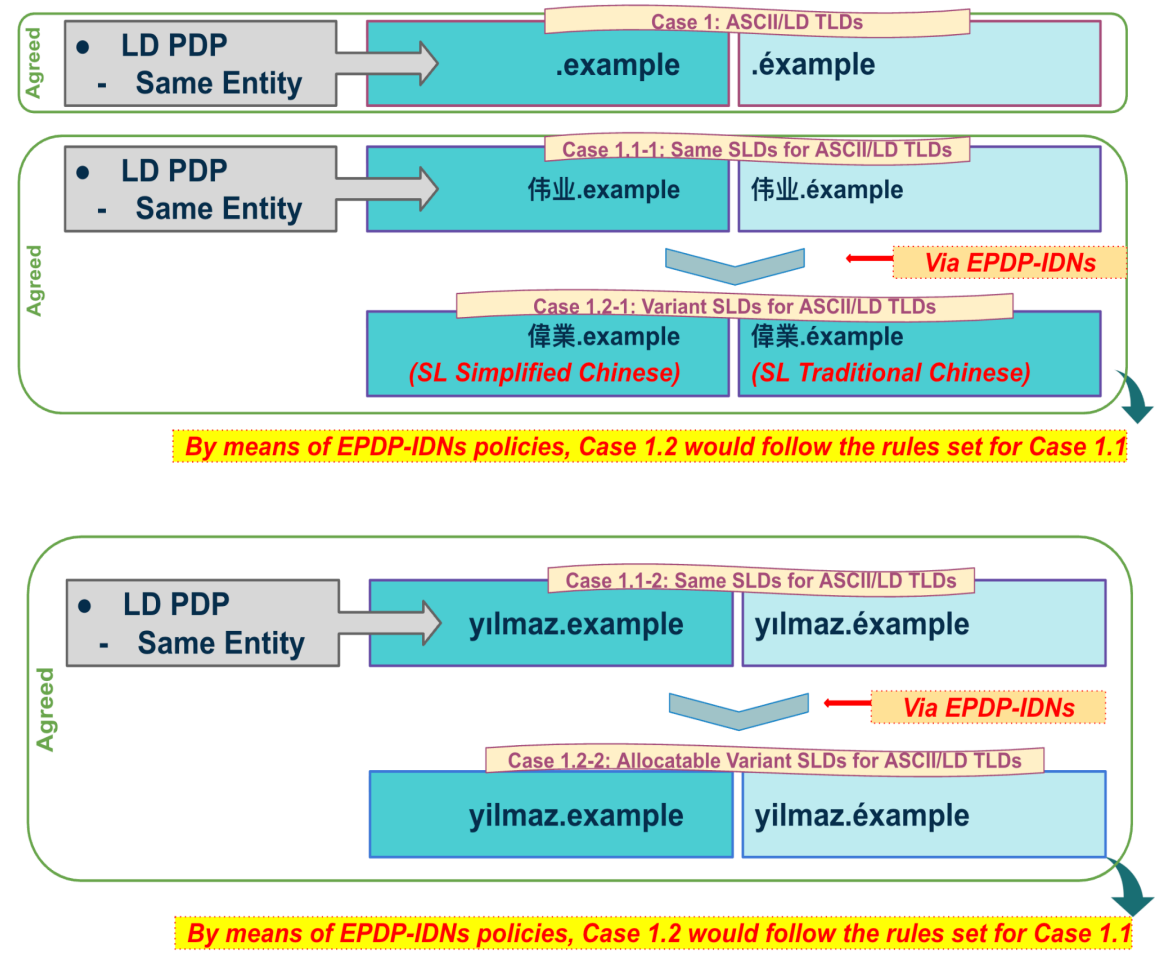
Rationale for Final Recommendation 43:

The LD PDP WG deliberated extensively on the "same entity" principle at the second-level and how it applies to the ASCII/LD Domain Set. While the WG generally agreed with EPDP-IDNs and with the broader application of the "same entity" principle, a more detailed examination was necessary for second-level management of the ASCII/LD Domain Sets. [Figure 4] below summarizes the WG's agreements on each case as it pertains to the application of the same entity for the second-level.

[118] EPDP-IDNs P2 Final Recommendation 4: Any allocatable variant domain names of exempted domain names pursuant to Final Recommendation 3 cannot be allocated unless and until only one registrant and one sponsoring registrar remain for the exempted domain name(s) from the relevant variant domain set.

[119] EPDP-IDNs P2 Final Recommendation 5: All of the existing and future IDN Tables for a given gTLD and its delegated gTLD variant label(s), if any, must be harmonized. This means that all of the IDN Tables for a gTLD and its delegated gTLD variant label(s) must produce a consistent variant domain set for a given second-level label registered under that gTLD or its delegated gTLD variant label(s).

[Figure 4] LD PDP's Consensus on the Same Entity Principle at the Second-level



Case 1 in the above Figure reflects the LD PDP WG's agreement that all gTLDs that constitute an ASCII/LD gTLD Set must be allocated only to the same registry operator in accordance with Final Recommendation 2. This means that the same gTLD registry operator manages and operates

both the ASCII gTLD and its corresponding LD gTLD(s) where all existing, applied-for, or future gTLD(s) that constitute an ASCII/LD gTLD Set can only be allocated or withheld for possible allocation to the same gTLD registry operator.

Cases 1.1 and 1.2 illustrate the LD PDP WG's agreement on the same second-level label cases for ASCII/LD gTLD Sets as well as the variant second-level label cases for the ASCII/LD gTLD Sets. As the examples for Cases 1.1-1 and 1.1-2 suggest (伟业.example and 伟业.éxample / yilmaz.example and yilmaz.éxample), identical second-level labels render these domains equivalent to Case 1, which, therefore, means that the set must likewise adhere to the "same entity" principle. As for Cases 1.2-1 and 1.2-2 (variants of the same second-level labels for both ASCII gTLD and the Latin diacritic gTLD), they strictly adhere to the "same entity" principle by means of the EPDP-IDNs policy.[120] According to EPDP-IDNs, this implies that all of the allocatable variant domain names that arise from an existing domain name based on a harmonized IDN Table, must be allocated or withheld for possible allocation only to the same registrant of the existing domain name. EPDP-IDNs also requires that all of the allocatable variant domain names from a variant domain set may only be allocated by the same sponsoring registrar, ultimately helping ensure that the same registrant can be verified. The LD PDP WG upholds this policy.

Case 1.3 concerns those second-level labels that are diacritic versions but not necessarily variants of each other within an ASCII/LD gTLD Set, which proved more complex. Examples include test.example and tést.éxample, tést.example and test.éxample, as well as sören.example and soren.éxample, and such cases (e.g., test.example vs. tést.example) already exist in TLDs, and no binding ruling has been issued. Some TLDS treat those as variants, others do not. Initially, the LD PDP WG had agreed not to establish rules for diacritic second-level labels within the ASCII/LD gTLD Sets and to leave such decisions to the discretion of the gTLD registry operators. In light of Public Comment, the WG decided to impose the same entity rules for Case 1.3 as well, which indicates that all the diacritic second-level labels within an ASCII/LD gTLD Set must be allocated or withheld for possible allocation only to the same gTLD registry operator, same sponsoring registrar, and the same registrant of the existing domain name. The WG found that if the same entity rule did not apply to such second-level labels, thus applying different standards between the top-level and the second-level, that practically it could result in user confusion. In order to find an easy solution and not to put another layer on top of variants/LGRs, the WG decided to include the diacritized versions of the ASCII letters from the list of eligible characters determined in Final Recommendation 1.2 in the second-level LGRs per Final Recommendation 42. Thus, essentially making all diacritic characters variants of their respective ASCII base character. The advantage is that all involved parties *(*registrants, registrars, resellers, registry operators, and end-users*)* only need to implement LGRs, which they are required to do

[120] EPDP-IDNs P2 Final Recommendation 1: The "same entity" principle applies to the allocation of future variant domain names at the second-level of gTLDs. This means that all allocatable variant domain names from a variant domain set must be allocated or withheld for possible allocation only to the same registrant. Additionally, all allocated domain names must be at the same sponsoring registrar.

regardless. Existing cases would, in any case, be exempted from the requirement per Final Recommendation 45.

Public Comment Review:

Final Recommendation 43 – Support as Written, but with Significant Rule Changes updated in the Rationale:

When dealing with Final Recommendation 41 and the public comments raised from ALAC on the same entity principle at the second-level, the WG agreed to update the rules for non-variant diacritic second-level labels for the ASCII/LD gTLDs, to ensure that the same entity rules also applied, ultimately to avoid causing more end-user confusion. This is a significant update since the Initial Report, since initially, the LD PDP WG had agreed not to establish rules for non-variant diacritic second-level labels within the ASCII/LD gTLD Sets, whereby such decisions were left to the discretion of the gTLD registry operators. For the Final Report, the policy language can remain as-is, because the necessary adjustments have been achieved by the introduction of Final Recommendation 42. The rationale for Case 1.3 has been updated accordingly.

Rationale for Implementation Guidance 44:

The LD PDP WG understood from EPDP-IDNs that automatic activation of variant domain names is an acceptable practice for certain gTLD registry operators that support domain names, especially in scripts such as Chinese.[121] For example, when a registrant registers a simplified Chinese domain name under a given gTLD, the corresponding traditional variant label may be automatically activated by the gTLD registry operator for the same registrant. However, Guideline 12 of the ICANN Board deferred guidelines from IDN Implementation Guidelines Version 4.0 and Recommendation 14 in SAC060[122] also made clear that caution is necessary. A conservative approach in allowing automatic activation of variant domain names was recommended in order to avoid any confusion during the management of variant labels both at the top- and second-levels. This understanding led to the development of Implementation Guidance 2 in the EPDP-IDNs Phase 2 Final Report.

Accordingly, the LD PDP WG maintained the stance that while gTLD registry operators should take into account language and script communities' widely acceptable practices among Internet

[121] Guideline 12 of the ICANN Board deferred guidelines from IDN Implementation Guidelines version 4.0 states, *"...In exceptional cases, i) to support a widely acceptable practice within Internet users of a language or script community, or ii) to abide by language or script established conventions, a TLD Registry may opt to activate a limited number of IDN Variant Labels at its discretion, according to its policies. In such cases, the TLD Registry must have a mechanism to limit automatic activation of IDN Variant Labels to a minimum."*

[122] See Recommendation 14, SAC060, p.20: https://www.icann.org/en/system/files/files/sac-060-en.pdf#page=20

users and established conventions, it is also necessary to set an upper limit of allocatable domain names that can be allocated to the same registrant within the ASCII/LD Domain Set. This means that since the number of allocatable domain names within an ASCII/LD Domain Set can be large, setting a maximum number that may be allocated to the same registrant should be considered to avoid any confusion arising from permutation-related issues. This approach remains aligned with the conservatism principle.

Meanwhile, this concept appears different from earlier decisions noted in Final Recommendation 30[123] and though technically slightly different, essentially the caution is the same. In earlier discussions, the LD PDP WG determined not to impose any ceiling value or restrictions regarding the application types (for existing or new), the TLD types (real words or invented words, geographic names, etc.), the number of strings within a set (how many strings to constitute a set), or the number of diacritical marks within a letter (e.g., if more than one diacritical mark per character like ũ’, ā̃, ḉ̧). EPDP-IDNs also set no arbitrary ceiling or threshold on variant labels. However in both cases, evaluations and fee structures are in place to ensure alignment with the conservatism principle. Thus, various factors such as cost, operational competence, and potential challenges would naturally lead applicants to taking a conservative approach when applying for and delegating such labels. This guidance simply asks that gTLD registry operators align with the conservatism principle, particularly when allocating domain names within an ASCII/LD Domain Set to the same registrant. Without careful consideration, the permutation process could generate numerous domain names, potentially leading to user confusion. Nevertheless, like the EPDP-IDNs Team, the LD PDP WG fully understood that determining the upper limit of domain names that can be allocated is ultimately at the gTLD registry operator’s discretion and must align with its policy.

Meanwhile, automatic activation of allocatable domain names within the ASCII/LD Domain Set is restricted to within a TLD activation – since there are no variant relationships across TLDs – and therefore, does not differ from stand-alone TLDs.

Public Comment Review:

Implementation Guidance 44 – Wording Change:

The LD PDP WG received a comment by ICANN org that this recommendation contains contextual and potentially material differences from EPDP-IDNs, which subsequently should not

[123] Final Recommendation 30: Generally consistent with Final Recommendation 8.1 from the EPDP-IDNs Phase 1 Final Report, no ceiling value for the number of Latin diacritic gTLD strings that constitute an ASCII/Latin Diacritic gTLD Set is necessary as economic, operational, and other factors that may impact the decision to apply for multiple Latin diacritic gTLD strings will keep the number of delegated top-level Latin diacritic strings conservative. For the LD PDP, there will be no restrictions on the number of diacritical marks applied to a single character nor the type of TLDs (e.g., real words identified in dictionaries, geographic names, brands).

be deemed "consistent" and updated accordingly. The WG responded that even though there may be inconsistency in the language, the underlying intent and behavior are consistent with EPDP-IDNs and merely updated for the purpose of LD PDP. Accordingly, the WG decided to update it to *"generally consistent."*

Rationale for Final Recommendation 45:

The LD PDP WG's agreement on the "same entity" principle has been established for the second-level through Final Recommendations 41, 42, and 43 where under this framework, the same entity rules must apply to all domains within an ASCII/LD Domain Set. Moreover, EPDP-IDNs has established that all allocatable variant domain names derived from an existing domain name – under a harmonized IDN Table – must be allocated, or withheld for possible allocation, solely to the same registrant of the existing domain name.

Before the "same entity" principle takes effect, some existing variant domain names within the same ASCII/LD Domain Set may already have been allocated to different registrants and/or managed by different sponsoring registrars. Similarly, prior to the IDN Table harmonization requirement coming into effect, certain existing variant domain names – identified as variants under one IDN Table for a given gTLD – may be treated as non-variant domain names under another IDN Table for the same gTLD. This inconsistency can similarly result in domain names from the same ASCII/LD Domain Set being allocated to different registrants and/or at different sponsoring registrars. To ensure stability and provide necessary safeguards for relevant Internet stakeholders, such as registrants, registrars, resellers, registry operators, and end-users, the LD PDP WG affirmed that all such existing variant domain names that do not conform to the "same entity" principle and that predate these requirements must be exempted. This also means that, where the exempted ASCII and its corresponding LD gTLD(s) are converted into an ASCII/LD gTLD Set in accordance with Final Recommendation 7, any existing second-level domain names that do not conform to the "same entity" principle must be exempted. In this context, "exempted" means that there will be no change to the contractual and allocation status of such existing domain names. The requirement for having the same registrant and the same sponsoring registrar will not be applied retroactively.[124]

In addition, enforcing the "same entity" principle by removing a variant domain from one existing registrant in favor of another would infringe upon the existing rights of the affected registrants, potentially leading to legal challenges, operational complexities, and other complications. Therefore, such existing domains are exempted from this policy and will be referred to as "exempted" in the course of this document, as previously mentioned, also consistent with Final Recommendation 3 from the EPDP-IDNs Phase 2 Final Report.
The last sentence: *"The gTLD registries operating an ASCII/Latin Diacritic gTLD*

[124] See "exempted" entry in "Section 3. Glossary" for definition and more details.

Set must determine ASCII/Latin Diacritic Domain Sets for each exempted label and protect from registration all labels in all such ASCII/Latin Diacritic Domain Sets, as appropriate" is to provide additional clarity on how to address existing domain names that were registered prior to the future policy effective date of the "same entity" principle. The protection of the same entity must be extended to the whole ASCII/LD Domain Set, as all such domains in related gTLDs also need to be protected.

Public Comment Review:

Final Recommendation 45 – Wording Change:

The LD PDP WG received support as written from many commenters. However, following the agreement to adopt a more conservative approach raised by ICANN org during the Public Comment, the WG incorporated new agreements for the second-level to ensure that risks were appropriately mitigated. Accordingly, a revised language was proposed for this recommendation, including reference to Final Recommendation 7 and granting exemption of existing domain names. In this instance, given that the underlying intent was considered consistent with that of the EPDP-IDNs, the WG updated the consistency notion to *"Generally consistent with."*

Rationale for Final Recommendation 46:

The LD PDP WG affirmed the EPDP-IDNs Team's decision that the exemption approach outlined in Final Recommendation 45 should be resolved as quickly as possible. To minimize the duration and scope of this exception, the LD PDP WG upheld the rule that no further allocation of any allocatable domain name within an ASCII/LD Domain Set containing exempted domain names is permitted. Additional allocations may occur only when there is a single registrant and a single sponsoring registrar for all exempted domain names in the ASCII/LD Domain Set, which effectively signals the end of the exemption period. In other words, as long as an ASCII/LD Domain Set has more than one registrant and/or sponsoring registrar, permitting further allocation would prolong the exemption and create continued violations of the "same entity" principle. It would also raise the issue of who should arbitrate competing claims if multiple registrants within the same ASCII/LD Domain Set seek an additional allocatable domain name.

By way of example, consider an ASCII/LD Domain Set that includes four allocatable domain names: s1.ATLD, s1v1.ATLD, s1.LDTLD, and s1v2.LDTLD. Suppose s1.ATLD is registered to Registrant A at Registrar X, while s1v1.ATLD is registered to Registrant B through Registrar Y. Under this recommendation, s1.LDTLD and s1v2.LDTLD must remain ineligible for allocation until there is a single registrant (i.e., either Registrant A or Registrant B, in this instance) and a single corresponding sponsoring registrar for the entire ASCII/LD Domain Set. One possible scenario that could satisfy this requirement is if Registrant B voluntarily transfers s1v1.ATLD to Registrant A at Registrar X. In that case, the "same entity" principle is achieved and the exemption situation

would be resolved. Another possible scenario is that the exemption ends through the deletion of either of the existing domains. Consequently, only one registrant and one sponsoring registrar remain, allowing for the registrant of the surviving domain name to request allocation of s1.LDTLD and s1v2.LDTLD through the corresponding registrar.

Aside from restricting any further allocation of additional allocatable domain name(s) within an ASCII/LD Domain Set containing exempted domain name(s), and preventing the expansion of the total pool of domain names requiring exemption, the LD PDP WG, in alignment with the EPDP-IDNs Team, agreed not to introduce additional constraints that could affect the existing rights of the registrants holding exempted domain names. Therefore, the exempted domain names are excluded from requirements set forth in Final Recommendations 48-49. Since the instances that would require exemption are expected to be minimal, it is preferable to leave the specific measures regarding the lifecycle management of exempted domain names to the discretion of the registrars and gTLD registry operators.

Public Comment Review:

Final Recommendation 46 – Support as written with Minor Wording Change:
The LD PDP WG received support from several commenters on this recommendation as written. A minor editorial change was made to revise *"Preliminary Recommendation 42"* to *"Final Recommendation 45."*

Rationale for Final Recommendation 47:
Only variants defined by IDN Tables are recognized, and the purpose of harmonization is to ensure that all IDN Tables associated with any gTLD within an ASCII/LD gTLD Set generate a consistent Variant Domain Set for any source domain name.[125] In other words, the harmonization requirement is intended to prevent inconsistencies; for example, inconsistencies may occur where two domain names that are calculated as variants under a certain IDN Table rule *(e.g., IDN Table A)* may not be considered variants under another (e.g., IDN Table B), and in this case, for the given second-level label registered under that ASCII gTLD or its corresponding LD gTLD string. It is, however, acceptable, if one of those domains is not valid under IDN Table B. The consistency requirement only says that if both domains are valid under another IDN Table, then they must also be variants under that IDN table. Thus, regardless of which IDN Table is applied for which language or script, the resulting variant domain sets for a source domain name must be consistent across all IDN Tables used for a given second-level label registered under that ASCII gTLD or its corresponding LD gTLD string(s).

[125] See "Section 3. Glossary" of this Final Report for more details about the "source domain name."

Currently, gTLD registry operators either use reference LGRs published by ICANN or develop their own IDN Tables and may use multiple IDN Tables covering a variety of languages and scripts for the gTLD it operates. Accordingly, they submit non-reference LGRs to ICANN org for review, focusing primarily on significant security, stability, and competition issues.

To address the security concerns and remain aligned with EPDP-IDNs, the LD PDP WG agreed that all IDN Tables associated with a given ASCII/LD gTLD Set, if any, must be harmonized. For consistency purposes, this requirement applies to both existing IDN Tables already implemented and to any future IDN Tables to be submitted to ICANN org for review. As a result, ICANN org will review all of the existing and future IDN Tables for an ASCII gTLD and its corresponding LD gTLD(s) holistically, ensuring that a consistent Variant Domain Set is produced for any given second-level label registered under the ASCII gTLD or its corresponding LD gTLD string(s). The LD PDP WG did not discuss the specific harmonization mechanism in detail; the process will follow the rules set forth in EPDP-IDNs Phase 2 and ultimately remain the responsibility of the gTLD registry operators.

Public Comment Review:

Final Recommendation 47 – Support as Written:
The LD PDP WG received support from several commenters on this recommendation as written.

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8) Topic 8: Adjustments in Registration Processes Pertinent to the Domain Name Lifecycle

Final Outputs:

Final Recommendation 48: Consistent with Final Recommendation 8 from the EPDP-IDNs Phase 2 Final Report,[126] a registrant and its sponsoring registrar MUST

[126] EPDP-IDNs P2 Final Recommendation 8: A registrant and its sponsoring registrar must jointly determine the source domain name, which must be registered, for calculating the variant domain set under a given gTLD and its delegated gTLD variant label(s), if any. The registrants and sponsoring registrars of the exempted variant domain names pursuant to Final Recommendation 3 are excluded from this requirement.

jointly determine the source domain name,[127] which MUST be registered, for calculating the Variant Domain Set under a given ASCII gTLD and its delegated Latin diacritic gTLD(s), if any. The registrants and sponsoring registrars of the exempted domain names pursuant to Final Recommendation 45 are excluded from this requirement.

Final Recommendation 49: Consistent with Final Recommendation 9 from the EPDP-IDNs Phase 2 Final Report,[128] the "same entity" principle, as set out in Final Recommendation 43, MUST be adhered to in all stages of the domain name lifecycle of all domains within an ASCII/Latin Diacritic Domain Set. The exempted domain names pursuant to Final Recommendation 45 are excluded from this requirement.

Final Recommendation 50: Consistent with Final Recommendation 10 from the EPDP-IDNs Phase 2 Final Report,[129] in the event an inter-registrar transfer process is initiated for a domain name, which is a member of an ASCII/Latin Diacritic Domain Set, the process MUST encompass all of its allocated domain names within the ASCII/Latin Diacritic Domain Set, if any, together. The exempted domain names pursuant to Final Recommendation 45 are excluded from this requirement.

Final Recommendation 51: Consistent with Final Recommendation 11 from the EPDP-IDNs Phase 2 Final Report,[130] in the event a domain name is ordered to be transferred as a result of a Uniform Domain Name Dispute Resolution Policy (UDRP) administrative proceeding, the transfer process MUST include all allocated domain names from the ASCII/Latin Diacritic Domain Set, if any, together. The exempted

[127] The source domain name here can be different per TLD, in accordance with the ASCII/LD Domain Set defined in Final Recommendation 41. This solution – allowing different source domain names per TLD – is consistent with EPDP-IDNs. To be precise, the source domain name must originate from the ASCII/LD Domain Set.

[128] EPDP-IDNs P2 Final Recommendation 9: The "same entity" principle, as set out in Final Recommendation 1, must be adhered to in all stages of the domain name lifecycle of the allocated variant domain names in the same variant domain set. The exempted variant domain names pursuant to Final Recommendation 3 are excluded from this requirement.

[129] EPDP-IDNs P2 Final Recommendation 10: In the event an inter-registrar transfer process is initiated for a domain name, which is a member of a variant domain set, the process must encompass all of its allocated variant domain names, if any, together. The exempted variant domain names pursuant to Final Recommendation 3 are excluded from this requirement.

[130] EPDP-IDNs P2 Final Recommendation 11: In the event a domain name is ordered to be transferred as a result of a Uniform Domain Name Dispute Resolution Policy (UDRP) administrative proceeding, the transfer process must include the domain name and all of its allocated variant domain names, if any, together. The exempted variant domain names pursuant to Final Recommendation 3 are excluded from this requirement.

domain names pursuant to Final Recommendation 45 are excluded from this requirement.

Implementation Guidance 52: Consistent with Implementation Guidance 12 from the EPDP-IDNs Phase 2 Final Report,[131] a Uniform Rapid Suspension System (URS) complainant is responsible for deciding whether to include allocated domain names of an ASCII/Latin Diacritic Domain Set, if any, of a disputed domain name as part of their URS complaint.[132]

Final Recommendation 53: Generally consistent with Final Recommendation 13 from EPDP-IDNs Phase 2 Final Report,[133] ICANN org MUST provide necessary information to dispute resolution providers, registries, registrars, registrants, and mark owners to enhance their understanding of ASCII/Latin Diacritic gTLD Set and domain names of an ASCII/Latin Diacritic Domain Set, in particular, their potential impact on dispute resolution proceedings.

Final Recommendation 54: Consistent with Final Recommendation 14 from the EPDP-IDNs Phase 2 Final Report,[134] to account for the "same entity" principle and its implications for domain names of an ASCII/Latin Diacritic Domain Set, gTLD registry operators SHOULD work with ICANN-accredited registrars to determine a mechanism to communicate between each other to facilitate the registration and management of the domain names across the ASCII/Latin Diacritic Domain Set, including an indication of the source domain name(s) and initial source domain name of the variant domain set(s).

[131] EPDP-IDNs P2 Implementation Guidance 12: A Uniform Rapid Suspension System (URS) complainant is responsible for deciding whether to include allocated variant domain names, if any, of a disputed domain name as part of their URS complaint.
[132] See Final Recommendations 53, 54, and Implementation Guidance 55 for details on how domain names of an ASCII/LD Domain Set and any other pertinent information could be made available to a complainant. Also refer to IANA for domain variant relations under the value, “registered”: https://www.iana.org/assignments/rdap-json-values/rdap-json-values.xhtml
[133] EPDP-IDNs P2 Final Recommendation 13: ICANN org must conduct outreach to dispute resolution providers, registries, registrars, registrants, and mark owners to enhance their understanding of gTLD variant labels and variant domain names, in particular, their potential impact on dispute resolution proceedings.
[134] EPDP-IDNs P2 Final Recommendation 14: To account for the "same entity" principle and its implications for variant domain names, gTLD registry operators should work with ICANN-accredited registrars to determine a mechanism to communicate between each other to facilitate the registration and management of variant domain names, including an indication of the source domain name(s) and initial source domain name of the variant domain set.

Implementation Guidance 55: Consistent with Implementation Guidance 15 from the EPDP-IDNs Phase 2 Final Report,[135] in order to allow a requestor to discover the allocated domain names of an ASCII/Latin Diacritic Domain Set, corresponding sponsoring registrars SHOULD accept requests for disclosure of this information and unless there are data privacy concerns, the information SHOULD be granted. In considering whether to disclose the information, the corresponding sponsoring registrars SHOULD balance the interest of the requestor with those of the data subject, where such balancing is REQUIRED by applicable law.

Final Recommendation 56: Consistent with Final Recommendation 16 from EPDP-IDNs Phase 2 Final Report,[136] if two or more delegated gTLDs belong to an ASCII/Latin Diacritic gTLD Set, the Root Zone Database on iana.org MUST denote, in a transparent manner, their relationship.

Implementation Guidance 57: Consistent with Implementation Guidance 17 from EPDP-IDNs Phase 2 Final Report,[137] gTLD registry operators SHOULD publish policies, in a transparent manner, that reflect their implementation of the LD PDP recommendations at the second-level. In particular, such policies SHOULD reflect the implementation of Final Recommendations 41-43, 45-47, 54 and Implementation Guidance 44.

[135] EPDP-IDNs P2 Implementation Guidance 15: In order to allow a requestor to discover the allocated variant domain names for a given domain name, corresponding sponsoring registrars should accept requests for disclosure of this information and unless there are data privacy concerns, the information should be granted. In considering whether to disclose the information, the corresponding sponsoring registrars should balance the interest of the requestor with those of the data subject, where such balancing is required by applicable law.

[136] EPDP-IDNs P2 Final Recommendation 16: If two or more delegated gTLDs belong to the same variant label set in accordance with RZ-LGR calculation, the Root Zone Database on iana.org must denote, in a transparent manner, their variant relationship and indicate which one serves as the primary gTLD for calculating the variant label set.

[137] EPDP-IDNs P2 Implementation Guidance 17: gTLD registry operators should publish policies, in a transparent manner, that reflect their implementation of the EPDP-IDNs Phase 2 recommendations. In particular, such policies should reflect the implementation of Final Recommendations 1, 3-6, 14 and Implementation Guidance 2.

Rationales:

Rationale for Final Recommendation 48:

As noted earlier in the rationale for Final Recommendation 47, a source domain name is a registered domain name under a given gTLD that serves as the essential input for generating the Variant Domain Set under a given ASCII gTLD or its delegated LD gTLD(s), if any. Accordingly, a domain name's status as a "variant" is determined by the source domain name. And while for the EPDP-IDNs the Variant Domain Set consists of variant label sets at both the second- and top-levels, the variant label set considered in this LD PDP applies only at the second-level. In this context, the second-level variant label set is derived from the second-level label of the source domain name using IDN Tables of the given gTLD.

Moreover, as established in Final Recommendation 41 and illustrated in [Figure 1] above, the WG found that within the ASCII/LD Domain Sets, a source domain name that is valid in one TLD may not be valid in another. Consequently, the source domain name itself may differ across TLDs within the ASCII/LD Domain Set. Regardless, the "same entity" principle must apply to all domains within the ASCII/LD Domain Set, as described in Final Recommendation 43.

To emphasize, the requirement for allowing different source domains per TLD is due to the potentially different – but still harmonized – LGRs per TLDs. For example, consider the TLDs, .example and .éxample, which constitute an ASCII/LD gTLD Set. Suppose the gTLD registry operator allows only ASCII second-level labels for .example and the Latin reference LGR for .éxample. In this scenario, a registrant could register straße.éxample as the source domain, thereby also allowing them to activate strasse.éxample, if desired, as it is an allocatable variant under that LGR. However, the corresponding domain, straße.example, would not be valid under the ASCII-only LGR for .example, and therefore, could neither be activated nor serve as a source domain name for that TLD. Even so, strasse.example must still be reserved for the same entity and is a valid candidate to serve as the source domain name within the .example TLD.

Meanwhile, the LD PDP WG aligned with the EPDP-IDNs Team that the source domain name itself must be identified between the registrant and the sponsoring registrar as a joint responsibility. Obviously, the source domain name must be registered, as without the registration of the source domain name, it would be impossible to know which allocatable variant domain names, if any, can potentially be allocated. In addition, the sponsoring registrars have discretion to decide on their specific implementation of this joint responsibility with registrants.

In practice, the source domain name may often be the first domain name registered by a registrant under a given gTLD and is, therefore, presumed to be the default source domain name. However, registrants may also intentionally select a different domain name as the source domain name based on their intended use. In short, the LD PDP WG recognized that ICANN org may need to undertake education and outreach to help registrars, registrants, and gTLD registry

operators to understand the concept of source domain name and its implications, particularly pertaining to compliance with the "same entity" requirement. These outreach efforts are further discussed and emphasized in Final Recommendation 53.

With respect to the exempted domain names pursuant to Final Recommendation 45, it is not required for the registrants and sponsoring registrars to identify the source domain names. A purpose for identifying the source domain name is to calculate which domain names are allocatable for future allocation. Since no further allocation of variant domain names of an exempted domain name is allowed until the exemption is resolved, as set out in Final Recommendation 46, the identification of the source domain name would be unnecessary. This would again raise the issue of who would determine the source domain name when multiple registrants hold the domain names within the same ASCII/LD Domain Set. However, once the exemption is resolved and the set returns to a single registrant and sponsoring registrar, the requirement to identify a source domain name must again apply.

Finally, the LD PDP WG did not address scenarios in which a source domain name might be changed or deactivated, beyond Final Recommendations 37-38 related to the removal of ASCII gTLDs or LD gTLDs. However, the LD PDP WG builds on EPDP-IDNs not to prescribe any policy recommendation pertaining to this matter, since the specific details in the domain name lifecycle management are discretionary on the part of gTLD registry operators and registrars, in accordance with their policies and practices.

Public Comment Review:

Final Recommendation 48 – Minor Wording Change:

The LD PDP WG received a comment by ICANN org that this recommendation contains contextual and potentially material differences from EPDP-IDNs – *"and"* to *"or"* – which subsequently should not be deemed *"consistent"* and updated accordingly. The WG did not find a particular reason why this change had been made and decided to retain *"and"* to become, *"...for calculating the variant domain set under a given ASCII gTLD and its delegated Latin diacritic gTLD(s), if any."* Consequently, other than a minor editorial change that was made from *"Preliminary Recommendation 42"* to *"Final Recommendation 45,"* this recommendation remains *"consistent with"* EPDP-IDNs.

Rationale for Final Recommendation 49:

The domain name lifecycle is generally summarized into five main stages, which are: 1) available, 2) active, 3) expiration, 4) redemption, and 5) pending deletion. During its "active" stage, a domain may experience various actions, including but not limited to renewal, update, transfer,

lock, and suspension. Details on these stages can be found in the EPDP-IDNs Phase 2 Final Report under the rationale for Final Recommendation 9.[138]

Consistent with EPDP-IDNs, each domain within an ASCII/LD Domain Set should be allowed to maintain its own domain name lifecycle, separate from that of other allocated domains from the same ASCII/LD Domain Set. The only overarching requirement is that the "same entity" principle, as set out in Final Recommendation 43, is adhered to at all times across the ASCII/LD Domain Set. Aside from this principle, no additional rules or constraints are imposed on domain name lifecycle management, except where the Transfer Policy *(see Final Recommendation 50)* or the transfer remedy under the Uniform Domain Name Dispute Resolution Policy (UDRP) *(see Final Recommendation 51)* may apply. The LD PDP WG also recognizes that the specific details of lifecycle management fall within the discretion of gTLD registry operators and registrars, in accordance with their policies and practices. The details of various stages remain consistent with EPDP-IDNs.[139]

With respect to the exempted domain names pursuant to Final Recommendation 45, the "same entity" requirement does not apply to their lifecycle management, as these domain names have already been treated as independent registrations. The LD PDP WG agreed to and will continue to not restrict the rights of affected registrants in managing their exempted domain names. The goal of not worsening the exemption situation is addressed by prohibiting further allocation of allocatable domain names within the affected ASCII/LD Set containing exempted domain names until the exemptions are resolved, as set out in Final Recommendation 46.

Public Comment Review:

Final Recommendation 49 – Support as written with Minor Wording Change:
The LD PDP WG received support from several commenters on this recommendation as written. A minor editorial change was made to revise *"Preliminary Recommendation 42"* to *"Final Recommendation 45."*

Rationale for Final Recommendation 50:
"Transfer" – traditionally known as an "inter-registrar transfer" – refers to the change of a sponsoring registrar for a domain name. During this process, the registrant may or may not be

[138] See rationale for Final Recommendation 9 from EPDP-IDNs Phase 2 Final Report in pp.31-34 at https://gnso.icann.org/sites/default/files/policy/2024/draft/gnso-idn-epdp-phase2-final-report-07oct24-en.pdf#page=31
[139] See rationale for Final Recommendation 9 from EPDP-IDNs Phase 2 Final Report in p.33 at https://gnso.icann.org/sites/default/files/policy/2024/draft/gnso-idn-epdp-phase2-final-report-07oct24-en.pdf#page=33

changed. By contrast, an inter-registrant transfer is considered an "update" of the domain name registration data. In this sense, transfer requires particular attention not only for domain name lifecycle management, but also for ensuring proper sponsorship of the ASCII/LD Domain Set.

For this topic, the LD PDP WG reaffirmed the EPDP-IDNs Team's decision that if a domain name within an ASCII/LD Domain Set changes hands at any point after allocation, all other allocated domain names within the same ASCII/LD Domain Set must remain contractually linked and change hands to the same registrant and the same sponsoring registrar at the same time; this is a persistent requirement. Accordingly, the LD PDP WG recommends that in the event an inter-registrar transfer process is initiated for any domain name that is part of an ASCII/LD Domain Set, all other allocated domain names within that ASCII/LD Domain Set must be included in the same transfer process. They must transition together to the same gaining registrar, and if applicable, to the same gaining registrant. In other words, the entire ASCII/LD Domain Set must stay together in the event of the transfer. This requirement is fully consistent with EPDP-IDNs. For clarity, it applies to both voluntary transfers initiated by a registrant and involuntary transfers resulting from circumstances such as UDRP determinations *(see Final Recommendation 51)* or loss of registrar accreditation, etc.

As with the approach described in Final Recommendation 49, exempted domain names are treated as independent registrations and are therefore, excluded from this requirement.

Meanwhile, the LD PDP WG conducted an impact analysis on ICANN's "Existing Consensus Policies," including the Transfer Policy and the Transfer Dispute Resolution Policy (TDRP), to assess whether its recommendations would affect any existing consensus policies. Since this recommendation remains consistent with the EPDP-IDNs – where its Final Recommendation 10 was reviewed and discussed with the Transfer Policy Review WG (TPR WG) at the time – it does not raise concerns for the Transfer Policy, nor were there any notable impacts identified. At present, the LD PDP WG's analysis indicates that this recommendation aligns with the Transfer Policy and avoids any conflict once implemented. Accordingly, its impact is minimal, if any. A detailed analysis of the impact on ICANN's "Existing Consensus Policies," including the Transfer Policy and the Transfer Dispute Resolution Policy (TDRP), is provided in "Section 4.2.2 Charter Question 4" of this report.

Public Comment Review:

Final Recommendation 50 – Wording Change:

The LD PDP WG was requested by ICANN org to make an editorial update to retain a consistent drafting style when the LD PDP Outputs are deemed "consistent" with the corresponding EPDP-IDNs Outputs. Consequently, the WG updated the language from the initial *"in accordance with"* to, instead, begin with *"Consistent with."*

Rationale for Final Recommendation 51:

The substantive ground for filing a UDRP administrative proceeding must satisfy the following criteria: (i) the disputed domain name registered by a domain name registrant is identical or confusingly similar to a trademark or service mark in which the complainant (the entity bringing the complaint) has rights; (ii) the domain name registrant has no rights or legitimate interests in respect of the disputed domain name; and (iii) the domain name has been registered and is being used in bad faith. If the complainant prevails, the UDRP administrative proceeding will result in one of the two possible outcomes: 1) the domain name be transferred to the prevailing complainant; or 2) the domain name be canceled.

The LD PDP WG reaffirmed the EPDP-IDNs decision that the "same entity" requirement must also apply to the transfer remedy under the UDRP, consistent with Final Recommendation 50. In other words, when a disputed domain name is ordered to be transferred, all other allocated domain names within the ASCII/LD Domain Set must also be transferred to the same prevailing complainant and placed under the same sponsoring registrar selected by the complainant.

Consistent with previous recommendations, the exempted domain names are treated as independent registrations and, therefore, remain excluded from this requirement.

Similarly with the Transfer Policy referenced in Final Recommendation 50, the LD PDP WG conducted an impact analysis on the UDRP as well to assess whether its recommendations would have any negative impact. Again, since this recommendation remains consistent with the EPDP-IDNs – where its Final Recommendation 11 was also reviewed and discussed with the TPR WG at the time – it does not raise concerns for UDRP, nor were any notable impacts identified. At present, the LD PDP WG's analysis indicates that this recommendation will only come into operation as a result of the UDRP, having no impact on altering or impacting its substance. There may be more concerns in the future that confusingly similar ASCII gTLD and LD gTLD strings could create legal challenges or strengthen UDRP complaints, potentially prompting the UDRP to evolve and adapt to such scenarios; however, these concerns are addressed through the ASCII/LD gTLD Set and the ASCII/LD Domain Set requirements, the associated application processes, contractual requirements, delegation and removal obligations, as well as through this recommendation itself. Taken together, these measures help minimize any negative impact on the UDRP. A detailed analysis of the impact on ICANN's existing Consensus Policies, including the UDRP, is provided in "Section 4.2.2 Charter Question 4" of this report.

It is important to note that the current UDRP Policy and Rules do not account for variant domain names or domain names that constitute an ASCII/LD Domain Set. Additional adjustments may be necessary to affect the "same entity" requirement in the transfer remedy, as set out in Final Recommendation 51. Given these potential complications, the LD PDP WG aligns with the EPDP-IDNs Team that UDRP experts should be involved in the future IRT for implementing such

recommendations so as to review these issues and discuss whether, and how, the UDRP Policy should be adapted to address such domain names.

In addition, the LD PDP WG has repeatedly emphasized the need for ICANN org's outreach to help educate registrars, registrants, and gTLD registry operators understand the concept of domain names that constitute an ASCII/LD Domain Set and their implications, especially pertaining to the compliance with the "same entity" requirement, Transfer Policy, and the UDRP. These outreach efforts are discussed further and guided through Final Recommendation 53.

Public Comment Review:

Final Recommendation 51 – Wording Change:

The LD PDP WG received a comment by IPC requesting for additional Outputs to provide guidance on UDRP and URS filing fees as it relates to disputed domain names within an ASCII/LD gTLD Set. IPC noted that the cost burden could potentially increase significantly where a UDRP or a URS covers more than one domain name in the set and suggested that such cases should be considered a single domain for the purposes of calculating UDRP/URS filing fees. In response, the WG concluded that such fee policy should remain subject to ICANN org's discretion, which falls outside of scope for this PDP, particularly given ICANN Board's guidance on Preliminary Recommendations 18 and 19 from the Initial Report on registry-level fees and the result that followed.

With respect to the phrase *"...all of the domain names that constitute the ASCII/Latin Diacritic Domain Set"* in the recommendation language, ICANN org suggested revising the text to clarify that only the allocated domain names are to be included in the transfer process, and the WG has incorporated as follows: *"...all allocated domain names from the ASCII/Latin Diacritic Domain Set."*

As a recurring theme, the WG also updated the language from the initial *"in accordance with"* to, *"Consistent with,"* in response to ICANN org's request to retain a consistent drafting style when the LD PDP Outputs are deemed "consistent" with the corresponding EPDP-IDNs Outputs.

Rationale for Implementation Guidance 52:

The URS complements the UDRP and its substantive grounds for filing a URS complaint are similar to the UDRP. A URS complaint must establish that: (i) the registered domain name is identical or confusingly similar to a word mark; (ii) the registrant has no legitimate right or interest to the domain name; and (iii) the domain was registered and is being used in bad faith.

The URS provides mark owners with a quick and low-cost mechanism to address clear-cut cases of intellectual property rights infringement. A URS complaint may include multiple disputed domain names, provided they are registered by the same registrant. If the complainant prevails, the sole remedy is to suspend the disputed domain name(s) for the remainder of the registration period. During suspension, the website, email, and other associated services cease to function, and the domain name may resolve to an informational suspension page hosted by the registrar. However, the registrant remains unchanged during the suspension period. In addition, under the URS Procedure, the complainant may request that the gTLD registry operator extend the suspension remedy for an additional year.

That said, the LD PDP WG aligns with the EPDP-IDNs that a URS complainant should consider the full ASCII/LD Domain Set of a disputed domain name when filing a URS complaint, in light of the "same entity" principle that governs the allocation of future domain names, as set out in Final Recommendation 43. If the disputed domain name has other allocated domain names registered to the same registrant, the complainant should be aware of them and determine whether they meet the three substantive URS criteria mentioned above. Therefore, the onus should be on the complainant to decide whether to include any or all of the other allocated domain name(s) within the same ASCII/LD Domain Set in the URS complaint.

It is important to note that the URS suspension remedy should only apply to the specific domain names included in a complaint and for which the complainant prevails. The suspension of one domain name does not automatically extend to other allocated domain names within the same ASCII/LD Domain Set. The "same entity" principle does not imply identical treatment or status for all domain names within the ASCII/LD Domain Set. Furthermore, the standard of proof required in a URS proceeding is high as the complainant must satisfy all three substantive criteria by demonstrating clear and convincing evidence against the disputed domain names. If the complainant seeks suspension remedy of the other allocated domain names within the set, those domain names must be explicitly included in the complaint, with supporting evidence provided to substantiate the claim. In any case, the management of specific details in the domain name lifecycle remains at the discretion of gTLD registry operators and registrars, in accordance with their policies and practices.

To address this complex issue and enhance understanding, the LD PDP WG upheld the approach set forth in EPDP-IDNs, requiring ICANN org to conduct outreach to various stakeholders, including trademark owners. The outreach aims to enhance their understanding of ASCII/LD gTLD strings that constitute an ASCII/LD gTLD Set, domain names that constitute an ASCII/LD Domain Set, their compliance with the "same entity" requirement, Transfer Policy, UDRP, and URS, and the associated implications. The WG has repeatedly emphasized the importance of ICANN org's outreach through the discussions of Final Recommendations 48-51, which will be further detailed and guided through Final Recommendation 53.

Meanwhile, Final Recommendation 12 from the EPDP-IDNs Phase 2 Final Report was also reviewed and discussed with the TPR WG at the time to ensure that this policy would not contradict with the TPR WG's policy and to develop a consistent solution for both groups. Though URS is not a part of the ICANN org's existing Consensus Policies, the LD PDP WG recognized that since this recommendation remains consistent with the EPDP-IDNs, no additional concerns are raised, and further analysis on the matter was not required.

Public Comment Review:

Implementation Guidance 52 – Support as Written:

The LD PDP WG received support from several commenters on this guidance as written.

Rationale for Final Recommendation 53:

The ASCII/LD gTLD Set and the ASCII/LD Domain Set are entirely new concepts, similar to the Variant Domain Set from EPDP-IDNs. The simultaneous delegation of ASCII gTLDs and their corresponding LD gTLDs in the root zone is likewise new to the DNS. As the policies and their associated technical considerations are complex, they will require significant understanding by the relevant stakeholders and educational efforts from ICANN org.

Throughout the development of the LD policy, especially those concerning second-level labels *(Topics 6-8)* and dispute resolution *(see Final Recommendations 50-51 and Implementation Guidance 52)*, the LD PDP WG repeatedly emphasized the critical importance of education and outreach led by ICANN org. During deliberations, the WG affirmed that relevant stakeholders – including the gTLD registries, registrars, registrants, and end users, as well as dispute resolution providers (e.g., UDRP, URS, and TM-PDDRP providers) and trademark owners – should be effectively informed to enhance their understanding of the requirements for, and the definition of, an ASCII/LD gTLD Set, identify the domain names comprising an ASCII/LD Domain Set, and be aware of the WG's policy position and their potential impact on dispute resolution proceedings.

The underlying purpose of clearly and effectively communicating this information to relevant stakeholders is not only to enhance their understanding of domain names and their relationship within the specified sets, but especially to encourage trademark owners to consider these domain names when using existing mandatory rights protections to secure their verified legal rights in the DNS and to pursue further protection through marketplace Rights Protection Mechanisms (RPMs). When a disputed domain name is part of an ASCII/LD Domain Set and allocated to the same registrant, complainants should account for all related names constituting the set when filing a complaint, per the UDRP administrative proceeding as guided in Final Recommendation 51. In accordance with the "same entity" principle and the WG's decisions regarding the set, the transfer process must include all domain names that constitute the ASCII/LD Domain Set.

In short, the LD PDP WG agreed that ICANN should assume a leading role in conducting outreach to relevant stakeholders and that accordingly, a more precise description than "conduct outreach" taken from EPDP-IDNs Phase 2 *(See Final Recommendation 13)* is required so that this action can be carried out with greater clarity and seriousness. Therefore, the WG changed this language to *"provide necessary information."* At this stage, the *"necessary information"* should include: 1) high-level principles and the requirements of the ASCII/LD gTLD Set and the ASCII/LD Domain Set relevant to target stakeholders; and 2) the policy position and recommendations determined by the WG relevant to target stakeholders. For the avoidance of doubt, the information requirement is not completely open-ended and is bound by *"their potential impact on dispute resolution proceedings."* This aims to deliver sufficient clarity for implementation.

Public Comment Review:

Final Recommendation 53 – Wording Change with Clarification through Rationale:
The LD PDP WG considered the comment from ICANN org with respect to *"necessary information,"* eventually providing clarity through the revised rationale that the information requirement is not completely open-ended and is bound by the potential impact on dispute resolution proceedings. This clarity will ultimately lessen the burden for ICANN org when it comes to outreach efforts during the implementation stage.

With respect to the comment on the policy language containing contextual or material differences from that of the EPDP-IDNs, the WG decided to preserve *"consistent with,"* since it believes the underlying intent and expected behavior remain the same, despite certain departures in the specific details. This decision resulted in the updated language to be *"generally consistent with."*

Rationales for Final Recommendation 54 and Implementation Guidance 55:
The LD PDP WG remains aligned with EPDP-IDNs and what was established through Final Recommendation 14 and Implementation Guidance 15. Accordingly, the WG strongly recommends establishing a mechanism that enables gTLD registry operators and ICANN-accredited registrars to communicate with one another to support the registration and management of domain names that constitute an ASCII/LD Domain Set. Such a mechanism is essential for upholding the "same entity" principle, identifying all allocated domain names within an ASCII/LD Domain Set, and ensuring that source domain name(s) within an ASCII/LD Domain Set – which may differ per TLD, as described through Final Recommendations 41 and 48 – is (are) clearly indicated during this information exchange. Contracted parties must have visibility into all of this information to ensure compliance with "same entity" requirements and to understand their implications for domain name lifecycle management.

Moreover, a requestor (e.g., registrant, security researcher, an end user, etc.) that is seeking information about allocated domain names (e.g., interest in registering a domain name or filing a URS complaint) needs to have that information and a mechanism to do this. It is considered to be within the public interest for end users to have access to relevant and/or additional information, provided that the public disclosure of allocated domain names held by the same registrant would not cause any data privacy concerns. In particular, in light of its deliberations on the UDRP and URS *(See Final Recommendations 50-51 and Implementation Guidance 52)*, the WG maintains that it is essential for all interested parties to know whether a disputed domain name has other allocated domain names within the ASCII/LD Domain Set, and if so, what they are, in order to consider their impact on the proceedings and potential outcomes. This is recommended through Implementation Guidance 55.

As established through EPDP-IDNs, the requestor can gain access to such information, without compromising the registrant's privacy, by the corresponding sponsoring registrar conducting a balancing test when responding to a request. This is to reduce the risks associated with processing personal data, while also determining the purpose and legitimacy of the request. Accordingly, this balancing test will inform whether to provide the requested information and if there are no data privacy concerns, the corresponding sponsoring registrar should accept the request and grant access to the requested information.

Although EPDP-IDNs discussions included certain suggestions to accomplish this through technical solutions such as EPP, the LD PDP WG did not prescribe any specific mechanisms and left the implementation at the discretion of the gTLD registry operators and the ICANN-accredited registrars. Some contracted parties already provide visibility into allocated variant domain names in their EPP and RDAP responses, and such practices could be extended to identify the allocated domain names within an ASCII/LD Domain Set.

Public Comment Review:

Final Recommendation 54 – Significant Change:

The LD PDP WG received a comment by ICANN org that this recommendation departed from EPDP-IDNs Phase 2 Final Recommendation 14 in that it omitted the requirement to include *"an indication of the source domain name(s) and initial source domain name of the variant domain set(s)."* The WG considered this an oversight, as a critical reference to the source domain names was inadvertently omitted. Given that even in the ASCII/LD Domain Set for the second-level, an indication of the source domain name is necessary to determine the disposition values of the variants in the second-level. Consequently, this clause was reinstated, which subsequently resolved the consistency notion, thereby preserving *"consistent with"* in the language to align with EPDP-IDNs.

Implementation Guidance 55 – Wording Change:

The LD PDP WG received support from several commenters on this guidance, including that from IPC. That said, the IPC considered this guidance redundant or unnecessary, suggesting that allocation recommendations already suggest that all allocated domains in a particular set should have the same underlying registrant data, such that the data for one such domain should be the same as all other domains in the set. The WG considered this to be based on a misunderstanding; while the WG understands that the required data is the same for all domains, this guidance does not require the same registrant data; but rather it requires that the set of domains is made available so that if the registrants asks the registrars for such information – e.g., what other domains are in the set? – the registrar accepts this request, and unless there are data privacy concerns, provide such information, making available which domains are existing and are allocated in a set. Accordingly, the WG agreed to retain this guidance.

With respect to ICANN org's request to make an editorial update to retain a consistent drafting style when the LD PDP Outputs are deemed consistent with the corresponding EPDP-IDNs outputs, the WG updated the language from the initial *"in accordance with"* to, instead, begin with *"Consistent with."*

Meanwhile, the WG acknowledges the importance of faithful implementation of the policy outputs, as requested by ALAC, and looks forward to implementation that remains aligned with the WG's intended purpose.

Rationale for Final Recommendation 56:

The LD PDP WG upholds the EPDP-IDNs policy that the Root Zone Database on iana.org,[140] which represents the delegation details of top-level domains, must denote, in a transparent manner, the relationship between the delegated gTLDs that belong to the same ASCII/LD gTLD Set and are operated by the same entity. The ASCII gTLDs and their corresponding LD gTLDs must be explicitly identified in this database, even if their categorization and relationship may already be apparent. This requirement reinforces the "same entity" principle while also respecting the set, which ultimately supports transparency in data practices. It is also essential for impacted parties to know whether a gTLD involved in a TM-PDDRP proceeding has other allocated gTLD strings within the same ASCII/LD gTLD Set.

That said, there is no prescriptive way for displaying the relationships among the delegated gTLDs that constitute an ASCII/LD gTLD Set operated by the same gTLD registry operator; this will be left to IANA's discretion to implement this requirement.

[140] See the Root Zone Database at https://www.iana.org/domains/root/db

Public Comment Review:

Final Recommendation 56 – Wording Change:

The LD PDP WG received a comment by ICANN org to revise the phrase, *"...if two (2) or more gTLD are delegated in order to constitute an ASCII/Latin Diacritic gTLD Set belonging to the same registry operator,"* to enhance clarity and conciseness. Accordingly, the WG updated the language to: *"...if two or more delegated gTLDs belong to an ASCII/Latin Diacritic gTLD Set."*

With respect to ICANN org's request to label the recommendation differently when there is a contextual or material difference from EPDP-IDNs, thus indicating a departure from the corresponding EPDP-IDNs language, the WG decided to maintain *"consistent with"* as the intent and behavior are consistent with EPDP-IDNs. The updates are made to be more applicable to the LD PDP circumstance.

Meanwhile, the WG acknowledges the importance of faithful implementation of the policy Outputs, as requested by ALAC, and looks forward to implementation that remains aligned with the WG's intended purpose.

Rationale for Implementation Guidance 57:

The LD PDP WG agreed with EPDP-IDNs that gTLD registry operators should transparently publish policies, reflecting their implementation of the LD PDP recommendations at the second-level. To align with this rule, the specific policies that the LD PDP WG agreed should be published include the ASCII/LD Domain Set requirements *(Final Recommendations 41 and 42)*, "same entity" principle for allocating domain names that constitute an ASCII/LD Domain Set *(Final Recommendation 43)*, and ceiling value for allocatable domain names *(Implementation Guidance 44)*. In addition, gTLD registry operators should publish policies reflecting the implementation of IDN Table harmonization *(Final Recommendation 47)*, the management of exempted domain names, if applicable *(Final Recommendations 45 and 46)*, and responses to domain name queries *(Final Recommendation 54)*. Hence, Final Recommendations 41-43, 45-47, 54 and Implementation Guidance 44 are highlighted in this implementation guidance. The decision of whether and how to publish these policies is at the discretion of each gTLD registry operator.

Public Comment Review:

Implementation Guidance 57 – Support as Written:

The LD PDP WG received support from several commenters on this recommendation as written. That said, the WG acknowledges the importance of faithful implementation of the policy

outputs, as requested by ALAC, and looks forward to implementation that remains aligned with the WG's intended purpose.

4.1.2 Charter Question 3

If a solution is needed to this issue, are any of the elements from either Phase 1 or Phase 2 of the EPDP on IDNs, or Topic 25 on IDNs from the SubPro Final Report, relevant, or warrant discussion specific to Latin script diacritics?

WG Response:

In response to Charter question 3, the WG reviewed Topic 25 on IDNs from the SubPro Final Report, as well as Phases 1 and 2 of the EPDP-IDNs. The WG dedicated a substantial amount of time on thoroughly reviewing the policy recommendations from both phases of the EPDP-IDNs. Since the final recommendations from EPDP-IDNs were built upon the SubPro Final Report, the WG chose to focus exclusively on the EPDP-IDNs Outputs; most elements from EPDP-IDNs were relevant and could be directly transferred to the LD PDP. The WG's deliberations and agreements are documented in detail in the Worksheet developed by GNSO Support Staff.[141]

However, the outputs (final recommendations and implementation guidance) that address Charter Question 3 – most of which are derived from EPDP-IDNs – are presented above under the response to Charter Question 1, organized by the eight topics listed earlier.

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[141] The WG leveraged the Outputs from SubPro Final Report and EPDP-IDNs Final Reports - both phases - by using the Worksheet as a review tool which was developed by the GNSO Support Staff.

4.2 Charter Questions with No Final Outputs

4.2.1 Charter Question 2

If a solution is needed to this issue, are any of the elements of the ccTLD Fast Track process transferable?

WG Response:

The WG reviewed the ccTLD Fast Track Process to assess whether any elements could be applied to the LD PDP. While the overall Fast Track Process and the Extended Process Similarity Review Panel (EPSRP) – essentially also an exception process – were found to be generally informative, they were not deemed directly relevant for detailed consideration within the context of the LD PDP.

However, the articulation of the "same entity" principle within the Exception Process received particular attention, especially in relation to preventing user confusion. In addition, the rule, *"re-assignment or selection by an entity other than the one holding the remaining gTLD(s) in the ASCII/Latin Diacritic gTLD Set for at least 10 years following the removal"* outlined in Final Recommendations 37 and 38, was drawn from a separate report – i.e., referenced from the Final Report ccNSO PDP4 (de-)selection of IDNccTLDs.[142]

In either case, these issues were examined in detail in the course of reviewing EPDP-IDNs as a response to Charter Question 3 presented under the response of Charter Question 1.

4.2.2 Charter Question 4

If a solution is needed to this issue, will it have any impact on existing Consensus Policies?

[142] There is a section on "Specific requirement following the retirement of the selected IDNccTLD string" which stipulates that *"Following the conclusion of its retirement process a selected IDNccTLD string is removed from the DNS, the selected IDNccTLD string shall not be available for re-assignment or selection for at least 10 years following the removal."* See Section 2.2.2 of the Final Report ccNSO PDP4 (de-)selection of IDNccTLDs at https://ccnso.icann.org/sites/default/files/field-attached/ccpdp4-final-report-23feb24-en.pdf#page=20. Note: ccTLD Fast Track Process and the Final Report ccNSO PDP4 (de-)selection of IDNccTLDs are different reports.

Starting with this PDP, the LD PDP WG is expected to consider the potential impact its recommendations may have on ICANN's existing Consensus Policies. This step is intended not only to ensure alignment between the recommendations during their development and current Consensus Policies, but also to identify any conflicts or areas where the recommendations may impact specific Consensus Policy elements. Should such impacts arise, the WG is expected to explicitly identify the impacts or corresponding modifications to existing Consensus Policies. The WG may also wish to escalate to the GNSO Council level for consideration through the GNSO Council liaison to the WG.

That said, similar activities have also been conducted in previous PDPs, but this is the first time that this question has been formally incorporated as a Charter question for the WG. This process ensures that this impact analysis is consistently conducted and that no such review is overlooked.

Initially, when the preliminary outputs were formulated, the WG reviewed each of the eight topics to assess whether any of the associated outputs could have an impact on the existing Consensus Policies. Although the preliminary outputs were updated following the Public Comment period, the WG did not receive any substantive comments on nor objections to this section and, therefore, did not identify any necessary substantive updates to the impact assessments.

WG Response:

In response to Charter Question 4, the WG briefly reviewed the list of ICANN's existing Consensus Policies presented on the ICANN website,[143] noting that they have been adopted by the ICANN Board and that the majority have been updated since 21 February 2024, to reflect the changes required for the implementation of the Registration Data Policy.

The WG further deliberated on the existing Consensus Policies in relation to the preliminary recommendations that it had developed, through the Worksheet developed by GNSO Support Staff.[144] In short, most recommendations had either minimal or no impact on the existing Consensus Policies, as they aligned with the existing Consensus Policies once they were adopted and put into effect, not altering or impacting any substance. This result remains unchanged for the final outputs.

While most Consensus Policies were classified as having no impact from the LD PDP's policy recommendations, there were three policies that were assessed as

[143] See ICANN's existing Consensus Policies at https://www.icann.org/en/contracted-parties/consensus-policies

[144] The WG reviewed ICANN's existing Consensus Policies by using the Worksheet as a review tool which was developed by the GNSO Support Staff.

potentially receiving a low level of impact, namely: UDRP, Transfer Policy, and TDRP. These were in particular connected with Final Recommendation 50 (Transfer Policy), Final Recommendation 51 (UDRP), and Implementation Guidance 52 (URS). At present, the LD PDP WG's analysis indicates that its recommendations align with the Transfer Policy and avoids any conflict once implemented. Moreover, its recommendations will only come into operation as a result of the UDRP decision, having no impact on altering or impacting its substance.

It is important to note that there may be increasing concerns in the future that confusingly similar ASCII gTLD and LD gTLD strings could create legal challenges or strengthen UDRP complaints, potentially prompting UDRP to evolve and adapt to such scenarios; however, these concerns are addressed through the ASCII/LD gTLD Set and the ASCII/LD Domain Set requirements, the associated application processes, contractual requirements, delegation and removal obligations, as well through Final Recommendation 51 and Implementation Guidance 52 themselves. In fact, all the measures taken through this PDP help minimize any negative impact on UDRP.

Consequently, the LD PDP WG agreed that its entire set of final outputs is generally low-risk and aligns with the existing Consensus Policies, signaling that there is no high alert impact here.

5 GPI/HR Framework Analysis

The WG was chartered to consider the potential impact of any LD PDP recommendations on the Global Public Interest (GPI) and human rights.[145] To facilitate these analyses, ICANN org, developed by the ICANN Board in consultation with the ICANN community, introduced a GPI checklist and a human rights impact assessment (HRIA) checklist for the WG to utilize in conducting work.[146] Though not prescriptive toolkits, the LD PDP WG decided to consult and benefit from utilizing these checklists to guide the work along, where they found them to be convenient and effective for completing this task.

Initially, when the preliminary outputs were formulated, the WG reviewed each of the eight topics per the GPIA and HRIA categories. At that time, there was not a line-by-line analysis of each individual output in recognition of the WG's understanding that its outputs have minimal impact on GPI and human rights, consistent with the outputs from EPDP-IDNs. In short, the LD PDP WG agreed that its 54 preliminary outputs generally have a positive impact on GPI that allows for a diverse and multilingual Internet, while prioritizing stability and security.

Through its HRIA analysis, although the WG noted potential concerns related to fees, the complexity and cost of processes, and awareness gaps – particularly for underserved communities and smaller registries with limited legal and technical support – from a policy-formulation perspective, the outputs were determined to address and mitigate these concerns, resulting in an overall positive rather than negative impact.

During the Public Comment period, three commenters expressed strong support for the effort devoted to these impact analyses, particularly commending the LD PDP for being the first to conduct such an effort. The Non-Commercial Stakeholder Group (NCSG), in particular, was highly supportive of the proactive steps taken by the WG to integrate such work. Its comments relating to "areas for improvement" are nevertheless highlighted here, both because certain aspects of its input have been incorporated into the updated and current HRIA and because they may

[145] GNSO PDPs have been chartered to consider the potential impact of their recommendations on the GPI and human rights since 2023. The new WG charter template includes a section on "Impact on Human Rights," requesting each PDP to consider these aspects and include this analysis as a part of their work. The GPI Framework is a request by the ICANN Board from 2024. These exercises aim to significantly strengthen policy alignment with GPI and human rights. Since the initiation of this effort, the LD PDP WG is the first group to take this work on proactively, setting an example for future PDPs.

[146] The WG conducted this portion of the work by using the following review tools, which were provided by the ICANN Board and the community through ICANN org: GPI Checklist and HRIA. Although these checklists are neither mandatory nor prescriptive at this time, the WG found them to be the most convenient and effective resources for completing this task. The checklists have been updated since Public Comment to incorporate the updated outputs and relevant comments.

provide useful considerations for future implementation efforts or have implications for future PDPs.

Three suggestions are particularly noteworthy, as the first two items were incorporated into this PDP and item 3 is relevant for future consideration:

1. Establishing a standardized structure and operationalizing mitigation measures that pairs each identified risk with at least one actionable mitigation measure, together with a designated owner and timeframe;
2. Disaggregating impacted communities, where, at minimum, there is a distinction between commercial and community registries, and between communities with established DNS presence and others that are new and/or emerging in the space.
3. Conducting and committing to post-implementation reviews, since the real test of such impacts may only appear during implementation, including independent assessors and public reporting.

Now, this report presents 57 policy outputs following the Public Comment Review, which took into account all the comments received, where appropriate. In particular, the concern raised by the community about excluded characters and the restrictive nature of the character set were addressed through the expansion of eligible characters, though still limited, and updates to the requirements for the ASCII/LD gTLD Sets as well as ASCII/LD Domain Sets.

Nevertheless, despite such revisions, some community members may still view the exclusion of certain non-diacritical cases or special characters from the Latin script having negative implications for human rights and diversity that result in future limitations. It is important to note that, while the PDP itself supports and enables a multilingual and diverse Internet, the WG was advised by ICANN org throughout the Review process to remain aligned with the conservatism principle, recognizing the exceptional nature of this PDP. This, in turn, enabled the WG to maintain its focus on its intended scope and remain faithful to its Charter. Accordingly, those issues that fall outside the current scope can be addressed through future efforts.

Details of these analyses can be found in the GPI checklist and the HRIA checklist.[147]

[147] Access both checklists through Footnote 146.

6 Next Steps

6.1 Outcome

The LD PDP WG developed 57 final outputs, including 45 final recommendations and 12 implementation guidance. Annex B provides the consensus designations for the outputs included in this Final Report. In summary, all of the 57 final outputs received "Full Consensus" support from the LD PDP WG.

6.2 Next Steps

The LD PDP Final Report will be considered by the GNSO Council to determine the next course of action. If the Final Report is approved by the GNSO Council, it will be forwarded to the ICANN Board of Directors for consideration and potential action in accordance with the ICANN Bylaws.

Annex A LD PDP WG Charter

ICANN | GNSO
Generic Names Supporting Organization

WG Name:	Latin Script Diacritics Policy Development Process WG	
Section I: Working Group Identification		
Chartering Organization(s):	Generic Names Supporting Organization (GNSO) Council	
Charter Approval Date:	19 December 2024	
Name of WG Leadership:	Michael Bauland	
Name(s) of Appointed Liaison(s):	GNSO Council Liaison: Prudence Malinki GDS Liaison: Isabelle Colas-Adeshina	
WG Workspace URL:	Latin Script Diacritics PDP Home	
WG Mailing List:	Mailing List Archive	
GNSO Council Resolution:	**Title:**	Initiation of the Policy Development Process on Latin Script Diacritics
	Ref # & Link:	20241113-4
Important Document Links:	**Procedural Documents:** • Annex A: GNSO Policy Development Process • GNSO Policy Development Process Manual • GNSO Working Group Guidelines **Non Exhaustive List of Substantive Documents:** • Discussion Paper About ".québec" Challenges • Presentation on Diacritics Issues in Latin Script • Proposal for Latin Script Root Zone Label Generation Rules • Final Issue Report on Latin Script Diacritics • IDN ccTLD Fast Track Process • Final Report ccNSO PDP4 (de-)selection of IDNccTLDs	

Section II: Mission, Purpose, and Deliverables

Mission & Scope:

Background

The Preliminary Issue Report was focused on the circumstance when an ASCII gTLD and the Latin script diacritic version of the gTLD are not variants of each other AND may be found to be visually similar to each other. The issue is theoretically possible for any existing ASCII or Latin script IDN gTLD and is essentially infinite for future applied-for ASCII or Latin script IDN gTLDs, where diacritics are involved. On 16 May 2024, the GNSO Council requested an Issue Report on this topic which once received, aided in determining next steps (e.g., initiating a PDP).

Preceding the GNSO Council's request for an Issue Report, the Council was briefed on the topic of Latin script diacritics. The Council welcomed analysis from ICANN org and the identification of potential mechanisms, that may be more efficient than requesting an Issue Report and completing a PDP, in order to allow for the potential simultaneous allocation of both the ASCII and Latin script diacritic versions of gTLDs. ICANN org proposed a solution that would leverage non-adopted recommendations related to string similarity since in essence, a solution for this issue is likely an exception process for visually similar strings. However, the Council was not comfortable with this solution and instead requested an Issue Report, which must include details on why code points with and without diacritics are distinct letters, and therefore not the "same" letter (i.e., are not variants); the Council was particularly interested in the outcome regarding variants, as the variant management rules coming from Phase 1 of the Expedited Policy Development Process on Internationalized Domain Names provide an avenue for "similar" strings to be simultaneously delegated.

The objective of this PDP Working Group is to determine: The limited circumstances in which a base ASCII gTLD and the Latin script diacritic version of the gTLD can be simultaneously delegated.

Scope & Charter Questions

This PDP is limited to examining a single issue. In circumstances where a base ASCII gTLD and the Latin script diacritic version of the gTLD are NOT variants of each other, what mechanism is needed in order to allow a single registry operator to simultaneously operate both gTLDs? A presumption for this issue is that the ASCII and Latin script diacritic have a non-negligible chance to be determined to be visually confusingly similar.

Charter Questions:

- Under what circumstances should a base ASCII gTLD and the Latin script diacritic version of the gTLD be simultaneously delegated, if any?
    - If such circumstances exist, what measures should be put into place in order to mitigate the potential for end-user confusion?
- If a solution is needed to this issue, are any of the elements of the ccTLD Fast Track process transferable?

- If a solution is needed to this issue, are any of the elements from either Phase 1 or Phase 2 of the EPDP on IDNs, or Topic 25 on IDNs from the SubPro Final Report, relevant, or warrant discussion specific to Latin script diacritics?
- If a solution is needed to this issue, will it have any impact on existing Consensus Policies?

What is not in scope: For clarification purposes, this PDP will use the Latin RZ-LGR https://www.icann.org/sites/default/files/lgr/rz-lgr-5-latin-script-26may22-en.html as one of the relevant baseline foundational documents when delineating scope. This PDP must understand the work that was completed by the Latin Generation Panel, including the rationale and impact of the various exclusions of Section 3: Variant Sets.

Impact on Human Rights

The WG is expected to consider the potential impact of any recommendations on human rights. Based on the information included in the request for an Issue Report and the Issue Report, the WG is expected to further consider whether there is a likely human rights impact, and if so, who are the groups expected to be impacted and the expected severity of the impact (high / medium / low). If an impact is anticipated, the WG is expected to address the following questions: 1) is the proposed action necessary to achieve the desired outcome, 2) is the proposed action proportionate, 3) is the proposed action legitimate.

Impact on the Global Public Interest

The WG is also expected to consider the potential impact of any recommendations on the Global Public Interest. In order to facilitate this analysis, the WG may wish to consult this checklist and may also benefit from consulting the GPI Toolkit Wiki page.

Deliverables:

To develop, at a minimum, an Initial Report and a Final Report regarding the WG's recommendations on issues relating to the Latin script diacritics, following the processes described in Annex A of the ICANN Bylaws and the GNSO PDP Manual.

If the WG concludes with any recommendations, the WG shall (or recommend the subsequent policy Implementation Review Team to) conduct a policy impact analysis and identify a set of metrics to measure the effectiveness of the policy change, including source(s) of baseline data for that purpose:

- Identification of policy goals
- Identification of metrics used to measure whether policy goals are achieved
- Identification of potential problems in attaining the data or developing the metrics
- A suggested timeframe in which the measures should be performed
- Define current state baselines of the policy and define initial benchmarks that define success or failure
- Metrics may include but not limited to (Refer to the Hints & Tips Page):
    - ICANN Compliance data
    - Industry metric sources
    - Community input via public comment
    - Surveys or studies

Data and Metric Requirements:

The WG should as soon as practicable:

1. Determine a set of questions which, when answered, provide the insight necessary to achieve the policy goals.
2. Determine whether certain data is required to help understand a specific issue or answer a charter question.
3. Determine a set of data and metrics which can be collected and analyzed to help answer the specific question.
4. Submit a Working Group Metrics Request Form (see GNSO Working Group Guidelines Section 4.5), if data gathering at the charter drafting phase or during the working phase is deemed necessary.

WG leaders shall review the Guidance document below to understand the need for performing due diligence before submitting a data gathering request to the GNSO Council.

Section III: Project Management

Work Product Requirement:

The WG leadership, in collaboration with the WG support staff and GNSO Council liaison, shall use a standard set of project management work products that help plan, guide, track, and report the progress of the WG from start to finish, and include the necessary data and information to assess the progress of the WG. These work products include but not limited to:

- Work Plan
- Summary Timeline
- Project Situation Report
- Project Plan
- Action Items

See the full suite of work products in the GNSO Project Work Product Catalog.

Project Status & Condition Assessment:

The WG leadership, in collaboration with the WG support staff and the GNSO Council liaison, shall assess the Status and Condition of the project at least once a month. Such frequency is required in preparation for the GNSO Council monthly meeting, where At-Risk or In-Trouble projects are subject to review by GNSO Council leadership, and in some instances may be deliberated by the full GNSO Council.

The WG leadership, in collaboration with the WG support staff and the GNSO Council Liaison, shall use an escalation procedure, which defines specific conditions that trigger the execution of a repeatable mitigation plan. The objective of this exercise is to return the project to an acceptable state ultimately achieving its planned outcomes.

Project Change Request:

The WG shall submit a Project Change Request (PCR) Form to the GNSO Council when its deliverable and baseline delivery date are revised. The PCR shall include a rationale for why these changes were made, their impacts on the overall timeframe of the PDP or any other interdependencies, and a proposed remediation plan.

The use of the PCR mostly occurs when primary deliverable dates are changed due to unforeseen or extreme circumstances. However, it can also be used to document changes in the deliverable requirements that may not have been identified in the chartering process.

When the PCR is required, it should be completed by the WG Chair and it will likely be presented to the GNSO Council for approval.

Resources Tracking:

The purpose for resource tracking is to deliver its work according to the work plan and be responsible for managing these resources.

For projects where dedicated funds are provided outside of budgeted policy activities, the WG shall provide regular budget versus actual expense reporting updates using a GNSO approved tool to allow for a better tracking of the use of resources and budget.

Section IV: Formation, Staffing, and Organization

Working Group Model:

Working Group Model: Open Model - the Working Group will be open to all parties interested in participating

Rationale: The “Open Model” is to allow any interested parties to actively participate in the Working Group.

The Council anticipates that a limited number of ICANN community members will have the prerequisite knowledge, background, expertise, and interest in the subject matter and as such, wishes to limit barriers to participation. The Council also believes that the Open Model is simpler to administer.

Membership Structure:

Role Descriptions: All persons actively participating in the Working Group will be considered Members and are expected to abide by the Statement of Participation, which is enforceable by the WG Chair and GNSO Council Leadership Team. See Section V. for details.

- **Members:** Members are expected to participate during the course of deliberations and in any WG consensus calls. Where applicable, Members should represent the view of their appointing organization, and may be called on to provide the official position of their appointing organization. Members are required to have a level of expertise in the relevant issues and ICANN policies and procedures as that may be impacted.

In the event a GNSO SG/C or SO/AC is unable to nominate a Member, the relevant group should endeavor to keep informed of milestones and potential recommendations that may affect the group.

- **Observers:** Anyone interested in this PDP may join as an observer. Observers are provided with read-only access to the mailing list and are not invited to attend meetings.

- **GNSO Council Liaison:** The GNSO Council shall appoint one (1) Liaison who is accountable to the GNSO. The GNSO Council Liaison must be a member of the Council, and the Council recommends that the Liaison should be a Council member and be able to serve during the life of this WG. See detailed description in the "GNSO Council Liaison" section below.

- **ICANN Org Liaison(s):** The ICANN Org Global Domains & Strategy (GDS) department shall appoint at least one (1) Liaison, who is expected to provide timely input on issues that may require ICANN Org input such as implementation-related queries and issues that might benefit from their subject matter expertise. The ICANN Staff Liaison(s) is not expected to advocate for any position and will not participate in any PDP Team consensus calls.

The GNSO Secretariat is expected to circulate a "Call For Volunteers" in accordance with the Working Group Model described above:

- Publication of announcement on relevant ICANN web sites including but not limited to the GNSO and other Supporting Organizations and Advisory Committee web pages; and
- Distribution of the announcement to GNSO Stakeholder Groups, Constituencies and other ICANN Supporting Organizations and Advisory Committees

Membership Criteria:

A. Expected Skills for Working Group Members
WG Members shall review the full text of the Working Group Member Skills Guide to understand the responsibilities and skills that they are expected to have in order to fully participate in the WG activities.

Collectively as a group, the WG Members MUST possess:

- Understanding of the Latin RZ-LGR, the new gTLD string similarity process, and Latin script diacritics.
- If possible, a practical understanding of what may be involved in a single registry operator running an ASCII and a Latin script diacritic simultaneously.
- Familiarity with GNSO policy development processes; direct experience is strongly preferred;
- Commitment to participating in Working Group meetings on a regular and ongoing basis;
- Highly effective oral, written, and interpersonal communication skills (in simple, comprehensible English);
- Ability to create factual, relevant and easily understandable messages, and able to succinctly deliver them to the Working Group;
- Research skills with the ability to discern factual, factually relevant, and persuasive details and sources;
- Commitment to manage a diverse workload, while collaborating with a Working Group of individuals with different backgrounds and interests in driving objectives;
- Knowledge of Working Group discussions, actions taken at meetings, and deliverables;

- Understanding of the perspectives and interests of the Members' own stakeholder group or constituency;
- Understanding of what consensus means and how consensus-building process works;
- Commitment to facilitate consensus by listening, explaining, mediating, proposing clear actions, and helping other Members;
- Commitment to avoid blocking consensus by looking beyond the stakeholder group or constituency affiliation of other Working Group Members and judging proposals/positions on their merits;
- Commitment to avoid re-litigating closed issues or deliberate obfuscation;
- Commitment to review the Consensus Playbook and attend potential training related to the Playbook, facilitate consensus building by employing the tools and techniques as detailed in the playbook;
- Maintain high personal levels of ethical conduct and integrity, including transparency of affiliation in the SOI, in treatment of others and respecting the professional reputation of all in the ICANN community.

B. Joining of New Members After Project Launch
New WG Members should be mindful that, once input/comment periods have been closed, discussions or decisions should not be resurrected unless there is group consensus that the issue should be revisited in light of new information that has been introduced. If the reopening is perceived as abusive or dilatory, a WG Member may appeal to the WG leadership.

Anyone can join a WG as a Member at any point as long as they get up to speed and do not reopen previously closed topics, unless they provide new information. Nonetheless, the WG leadership may decide, in consultation with the WG and in reference of Criteria for Joining of New Members guidance, whether new Members can be accepted after the start of the WG effort.

The WG could decide to suspend new Members for several reasons, including but not limited to:

- The Working Group has produced its Initial Report, analyzed public comments, and is in the midst of a consensus process for its Final Report;
- The Working Group is nearing the end of a complex and lengthy policy development process and although it has not produced a Final Report, the status of the work is that the Working Group is too close to finalizing its work such that new Members would not be able to meaningfully contribute;
- Someone wishes to join as a participant in a sub-team of the Working Group, but that sub-team has completed its work and passed its recommendations to the full Working Group.

C. Expert Contributors
The WG has flexibility/discretion to invite participation of the expert contributors in specific fields as it deems necessary.

Expert contributors are not expected to participate in any consensus designation process, but provide perspective/expertise/knowledge to the PDP WG.

Based on the WG's determination, the Council may be able to use an independent evaluation process (e.g., GNSO Council Standing Selection Committee) to confirm whether those individuals have demonstrated the expertise/knowledge/perspective.

Leadership Structure:

One (1) Chair + One (1) Vice Chair

The GNSO Council will appoint one (1) qualified, independent, and neutral Chair for the WG.

The WG, once formed, may select one (1) Vice Chair to assist the Chair. The Vice Chair can be selected among the WG's Members.

Should at any point a Vice Chair need to step into the role of Chair, the same expectations with regards to fulfilling the role of Chair as outlined in this charter will apply.

Leadership Criteria:

Expectations for the WG Leadership (Chair + Vice Chair):
The WG leadership is expected to carry out the role and responsibilities and meet the qualification as detailed in the Expectations for Working Group Leaders & Skills Checklist.

In short, the WG leadership is expected to:

- Lead with neutrality and impartiality;
- Encourage representational balance;
- Ensure WG documents represent the diversity of views;
- Balance working group openness with effectiveness;
- Make time commitment;
- Contribute ideas and knowledge to working group discussions;
- Oversee project management of the WG deliberations;
- Build consensus;
- Make consensus designation on working group recommendations;
- Enforce compliance with Statement of Participation;
- Enforce compliance with ICANN's Expected Standards of Behavior;
- Ensure compliance with Community Anti-Harassment Policy;
- Be versed in GNSO Operating Procedures; and
- Handle working group complaint process.

Expectation for the WG Chair:
As outlined in the GNSO Working Group Guidelines, the purpose of a Chair is to call meetings, preside over working group deliberations, manage the process so that all participants have the opportunity to contribute, and report the results of the Working Group to the Chartering Organization. These tasks require a dedicated time commitment as each week calls have to be prepared, the agenda concretized, and relevant material reviewed. The Chair shall be neutral. While the Chair may be a member of any group which also has representation on the Working Group, the Chair shall not act in a manner which favors such group. The Chair shall not be a Member of the Working Group for purposes of consensus calls.

In addition, it is expected that interested candidates shall have considerable experience in chairing working groups, and direct experience with at least one GNSO Policy Development Process throughout its lifecycle. Familiarity with the functioning of a Working Group is important to understand the various leadership skills that are necessary to employ during a WG's lifecycle. For example, a Chair has to ensure that debates are conducted in an open and transparent manner and that all interests are equally and adequately represented within the Group's discussions. During the later stages of a WG when recommendations are drafted, a Chair will benefit from understanding the

viewpoints of various participants to ensure that an acceptable and effective outcome – ideally in the form of consensus – can be achieved.

The WG Chair is specifically expected to carry out the following responsibilities, including but not limited to:

- Attend all PDP Working Group meetings to assure continuity and familiarity with the subject matter and the ongoing discussions;
- Prepare meetings by reading all circulated materials;
- Be familiar with the subject matter and actively encourage participation during the calls;
- Be active on the PDP mailing list and invite PDP WG members and liaisons to share their viewpoints;
- Drive the progress forward and assure that discussions remain on point;
- Work actively towards achieving policy recommendations that ideally receive full consensus;
- Ensure that particular outreach efforts are made when community reviews are done of the group's output;
- Underscore the importance of achieving overall representational balance on any sub-teams that are formed;
- Enforce Statement of Participation, ICANN's Standards of Behavior, and Community Anti-Harassment Policy;
- Coordinate with staff and ensure that the WG is supported as effectively as possible; and
- Conduct consistent, adequate, and timely reporting to the GNSO Council on the progress of the PDP.

The WG Chair is expected to meet most of the following qualifications:

- Direct experience in consensus building processes and preferably direct experience in GNSO PDPs;
- Knowledge of and preferably direct experience in IDN related work at ICANN;
- Knowledge of ICANN policies and procedures as they relate to the relevant issue;
- Project management skills: including facilitating goal-oriented Working Group meetings, agenda setting and adherence, time management, encouraging collaboration, driving the completion of action items and achieving milestones in accordance with the WG timeline and work plan, keeping the Working Group's actions, discussions and meetings focused on serving its ultimate goals and deliverables;
- Ability to enforce compliance with the Statement of Participation, ICANN's Expected Standards of Behavior, and Community Anti-harassment Policy;
- Ability to determine when outreach is necessary and to undertake it;
- Ability to identify the diversity of views within the Working Group, if applicable;
- Knowledge of and ability to designate consensus on Working Group recommendations based on the level of agreement;
- Ability to help Working Group Members understand that a consensus is a decision that is collaboratively reached and that the Working Group members can "live with"; accordingly, it may not be a perfect or unanimous decision;
- Commitment to review the Consensus Playbook and attend potential training related to the Playbook, facilitate consensus building by employing the tools and techniques as detailed in the playbook;
- Ability to refrain from promoting a specific agenda and ensuring fair, objective treatment of all opinions within the Working Group;
- Ability to distinguish between Working Group Members offering genuine dissent and those raising irrelevant or already closed issues merely to block the Working Group's progress toward its goal;

- Ability to halt disruption and, in extreme cases, exclude a Working Group Member from a discussion per Section 3.5 of the GNSO Working Group Guidelines on Rules of Engagement;
- Ability to ensure that closed Working Group decisions are not revisited, unless there is a consensus to do so (usually in light of new information brought to the Working Group's attention);
- Ability to commit the time required to perform the WG Chair's responsibilities;
- Knowledge of topics in other policy efforts that have relations to or dependencies with the PDP working group topics;
- Ability to create factual, relevant and easily understandable messages, and able to clearly deliver them to the Working Group
- Ability to deliver a point clearly, concisely, and in a friendly way
- Exhibit agility and confidence in evolving situations and is able to swiftly transition from topic to topic
- Highly effective oral, written, and interpersonal communication skills (in simple, comprehensible English);
- Excellent research skills with the ability to discern factual, factually relevant, and persuasive details and sources;
- Commitment to manage a diverse workload, while collaborating with a Working Group of individuals with different background and interests in driving objectives; and
- Able to effectively build a course of action, analyze trade-offs, and make recommendations even in ambiguous situations; and
- Knowledge of and ability to participate in the Working Group complaint process, commitment to review the Clarification to Complaint Process in GNSO Working Group Guidelines Section 3.7.

Expressions of Interest for the WG Chair:
Staff is expected to publish a request for Expressions of Interest for the role of Chair. The GNSO Council leadership and Standing Selection Committee leadership will jointly review the responses and will propose a Chair to the GNSO Council which will then either affirm the selection or reject the selection and send the process back to the GNSO Council leadership and Standing Selection Committee leadership.

The Expression of Interest should address the following issues, including but not limited to:

- What is the applicant's interest in this position?
- What particular skills and attributes does the applicant have that will assist him/her in chairing the WG and facilitating consensus building?
- What is the applicant's knowledge of and/or experience in Latin script diacritics related work at ICANN, if any?
- What is the applicant's knowledge of ICANN policies and procedures?
- What is the applicant's experience with the GNSO Policy Development Process?
- What is the applicant's experience with consensus building involving various stakeholders, as well as familiarity with the Consensus Playbook?
- Is the applicant able to commit the time required and necessary work needed to chair the PDP?
- Does the applicant have any affiliation with or involvement in any organization or entity with any financial or non-financial interest in the subject matter of this PDP?
- Also expected to be included:
    - A link to an up-to-date Statement of Interest (SOI) - https://community.icann.org/x/c4Lg
    - A statement confirming commitment and ability to act neutrally.

Expectations for the Vice Chair:
Finally, as also pointed out in the GNSO Working Group Guidelines, the Vice Chair may facilitate the work of the Chair by ensuring continuity in case of absence, sharing of workload, and allowing the Chair to become engaged in a particular debate. As a result, similar responsibilities and qualifications are expected from the Vice Chair, although the overall workload may be reduced as a result of being able to share this with the Chair.

Leadership Review:

The review of WG leadership provides a regular opportunity for the GNSO Council to check in with WG leadership and Council Liaison to identify resources or input that Council may need to provide, as well as opportunities for the leadership team to improve. The review also enables the GNSO Council to work with the WG leadership and Council Liaison to develop and execute a plan to address possible issues/opportunities identified.

The GNSO Council leadership and/or the Council Liaison may initiate the WG leadership review in response to circumstances indicating that a review is necessary.

The WG leadership shall review the full text of Regular Review of Working Group Leadership document to understand the regular review of WG leadership performance by the GNSO Council, as well as the member survey that feeds into the review. This leadership review may be conducted alongside the WG self-assessment, or be integrated as part of the WG self-assessment based on the GNSO Council's further improvement of the review mechanism.

GNSO Council Liaison:

The GNSO Council shall appoint one (1) Liaison who is accountable to the GNSO. The Liaison must be a member of the Council, and the Council recommends that to the extent possible, the Liaison should be a Council member for the duration of this WG.

The complete description of role & responsibilities for GNSO Council Liaison is described in the GNSO Council Liaison Supplemental Guidance. In short, the GNSO Council Liaison is expected to:

- Fulfill liaison role in a neutral manner
    - Importantly, the liaison is expected to fulfil his/her role in a neutral manner. This means that everything the liaison does during his/her tenure, including but not limited to participating in WG calls, reporting status, conveying information, and escalating issues, should be done in that neutral manner.
- Serve as an interim WG Chair until a Chair is named
- Be a regular participant of WG meetings
- Participate in regular meetings with WG Chair
- Report to Council on the WG progress
- Convey to Council on WG communications, questions, concerns
- Inform WG Chair about Council activities impacting the WG
- Refer to Council questions related to WG Charter
- Assist or engage when WG faces challenges
- Assist in case of abuse of ICANN's Expected Standards of Behavior and Community Anti-Harassment Policy
- Assist with knowledge of WG processes and practices
- Facilitate when there is disagreement regarding consensus designation

- Facilitate when a Section 3.7 Complaint Process is invoked
- Initiate the WG leadership review in response to circumstances indicating that a review is necessary

The liaison shall complete the following actions for onboarding purposes:

- Review the GNSO Council liaison to the WGs - Role Description;
- Review the New Liaison Briefing and Liaison Handover document to understand the actions the liaison needs to take for onboarding purposes.
- Consult the supplemental guidance developed to provide more precision in their responsibilities and the frequency in which they must be carried out;
- Familiarize with the provisions of the GNSO Operating Procedures relevant to liaisons;
- Subscribe to the PDP mailing lists and relevant sub teams;
- Subscribe to the PDP Leadership mailing list(s), if applicable. In addition, add to the PDP Leadership Skype chat (or other communication channel) if applicable;
- Consider requesting a catch up call with the relevant GNSO policy support staff. This call should clarify the role of the liaison in terms of PDP conference call attendance, expected responsibilities and an update as to the current status of the PDP if already in operation (milestones and anticipated hurdles);
- Review links to the wiki workspaces and mailing list archives via email;
- (If the PDP is already in operation) Consider requesting that PDP Leadership and the outgoing liaison(s) share relevant briefing documents specific to the PDP, to highlight the scope of the PDP charter, current status, timeline, milestones, problem areas/challenges, anticipated hurdles, etc;
- (If the PDP is already operational) Participate in an onboarding conference call with the incoming and outgoing liaisons as well as PDP Leadership; GNSO policy support staff will also be present on the call.

Support Staff:

The ICANN Staff assigned to the WG will fully support the work of the Working Group as requested by the Chair including meeting support, document drafting, editing and distribution and other substantive contributions when deemed appropriate.

Staff assignments to the Working Group:

- ICANN policy staff members
- GNSO Secretariat

In addition, regular participation of and consultation with other ICANN Org departments such as the GDS is anticipated to ensure timely input on issues that may require ICANN org input such as implementation-related queries. As such, the ICANN Org GDS is expected to appoint at least one (1) Liaison to the WG, as specified in the “Membership Structure” section above.

Furthermore, additional policy staff resources are available to assist the WG leadership for consensus building purposes.

Section V: Rules of Engagement

Statements of Interest (SOI) Guidelines:

Each Member of the WG is required to submit an SOI in accordance with Section 5 of the GNSO Operating Procedures.

Statement of Participation:

Each Member of the WG must acknowledge and accept the Statement of Participation (as provided below), including ICANN's Expected Standards of Behavior, before he/she can participate in the WG.

Statement of Participation

As a Member of the Policy Development Process on Latin Script Diacritics Working Group:

- I agree to genuinely cooperate with fellow Members of the Working Group to deliberate the issues outlined in the Charter. Where there are areas of disagreement, I will commit to work with others to reach a compromise position to the extent that I am able to do so;
- I acknowledge the remit of the GNSO to develop consensus policies for generic top level domains. As such, I will abide by the recommended working methods and rules of engagement as outlined in the Charter, particularly as it relates to rules in GNSO Working Group Guidelines;
- I will treat all Members of the Working Group with civility both face-to-face and online, and I will be respectful of their time and commitment to this effort. I will act in a reasonable, objective, and informed manner during my participation in this Working Group and will not disrupt the work of the Working Group in bad faith;
- I will make best efforts to regularly attend all scheduled meetings and send apologies in advance when I am unable to attend. I will take assignments allocated to me during the course of the Working Group seriously and complete these within the requested timeframe.
- I agree to act in accordance with ICANN Expected Standards of Behavior, particularly as they relate to:
    - Acting in accordance with, and in the spirit of, ICANN's mission and core values as provided in ICANN's Bylaws;
    - Listening to the views of all stakeholders and working to build consensus; and
    - Promoting ethical and responsible behavior;
- I agree to adhere to any applicable conflict of interest policies and the Statement of Interest (SOI) Policy within the GNSO Operating Procedures, especially as it relates to the completeness, accuracy, and timeliness of the initial completion and maintenance of my SOI; and
- I agree to adhere to the ICANN Community Anti-Harassment Policy and Terms of Participation and Complaint Procedures.

As a Member of the PDP on Latin Script Diacritics Working Group:

- I understand reaching consensus does not mean that I am unable to fully represent the views of myself or the organization I represent. I will abide by the recommended working methods and rules of engagement as outlined in the Charter, particularly as it relates to designating consensus in GNSO Working Group Guidelines.

I acknowledge and accept that this Statement of Participation, including ICANN's Expected Standards of Behavior, is enforceable and any individual serving in a Chair role (such as Chair,

Co-Chair, or Acting Chair or Acting Co-Chair) of the Working Group and GNSO Council Leadership Team have the authority to restrict my participation in the Working Group in the event of non-compliance with any of the above.

Problem/Issue Escalation & Resolution Process:

The problem/issue escalation & resolution process within the WG is provided in Sections 3.4 and 3.5 of the Working Group Guidelines. WG Members should also reference the Guidelines Concerning ICANN Org Resources for Conflict Resolution and Mediation.

Formal Complaint Process:

The formal complaint process within the WG is provided in Section 3.7 of the Working Group Guidelines. Further details regarding the formal complaint process are included in the Clarification to Complaint Process in GNSO Working Group Guidelines document.

The formal complaint process may be modified by the GNSO Council at its discretion.

Section VI: Decision Making Methodologies

Consensus Designation Process:

Section 3.6 of the GNSO Working Group Guidelines, as included below, provides the standard consensus-based methodology for decision making in GNSO WGs.

For consensus building purposes, the WG Leadership, WG Members, and GNSO Council Liaison are expected to review the Consensus Playbook which provides practical tools and best practices to bridge differences, break deadlocks, and find common ground within ICANN processes; potential training related to the Consensus Playbook may be provided for WG Leadership, Members, and GNSO Council Liaison.

3.6 Standard Methodology for Making Decisions

The Chair will be responsible for designating each position as having one of the following designations:

- **Full consensus** - when no one in the group speaks against the recommendation in its last readings. This is also sometimes referred to as **Unanimous Consensus.**
- **Consensus** - a position where only a small minority disagrees, but most agree. *[Note: For those that are unfamiliar with ICANN usage, you may associate the definition of 'Consensus' with other definitions and terms of art such as rough consensus or near consensus. It should be noted, however, that in the case of a GNSO PDP originated Working Group, all reports, especially Final Reports, must restrict themselves to the term 'Consensus' as this may have legal implications.]*
- **Strong support but significant opposition** - a position where, while most of the group supports a recommendation, there are a significant number of those who do not support it.
- **Divergence** (also referred to as **No Consensus**) - a position where there isn't strong support for any particular position, but many different points of view. Sometimes this is due

to irreconcilable differences of opinion and sometimes it is due to the fact that no one has a particularly strong or convincing viewpoint, but the members of the group agree that it is worth listing the issue in the report nonetheless.

- **Minority View** - refers to a proposal where a small number of people support the recommendation. This can happen in response to a **Consensus**, **Strong support but significant opposition**, and **No Consensus;** or, it can happen in cases where there is neither support nor opposition to a suggestion made by a small number of individuals.

In cases of **Consensus**, **Strong support but significant opposition**, and **No Consensus**, an effort should be made to document that variance in viewpoint and to present any **Minority View** recommendations that may have been made. Documentation of **Minority View** recommendations normally depends on text offered by the proponent(s). In all cases of **Divergence,** the WG Chair should encourage the submission of minority viewpoint(s).

The recommended method for discovering the consensus level designation on recommendations should work as follows:

i. After the group has discussed an issue long enough for all issues to have been raised, understood and discussed, the Chair, or Co-Chairs, make an evaluation of the designation and publish it for the group to review.
ii. After the group has discussed the Chair's estimation of designation, the Chair, or Co-Chairs, should reevaluate and publish an updated evaluation.
iii. Steps (i) and (ii) should continue until the Chair/Co-Chairs make an evaluation that is accepted by the group.
iv. In rare case, a Chair may decide that the use of polls is reasonable. Some of the reasons for this might be:
    - A decision needs to be made within a time frame that does not allow for the natural process of iteration and settling on a designation to occur.
    - It becomes obvious after several iterations that it is impossible to arrive at a designation. This will happen most often when trying to discriminate between **Consensus** and **Strong support but Significant Opposition** or between **Strong support but Significant Opposition** and **Divergence.**

Care should be taken in using polls that they do not become votes. A liability with the use of polls is that, in situations where there is **Divergence** or **Strong Opposition**, there are often disagreements about the meanings of the poll questions or of the poll results.

Based upon the WG's needs, the Chair may direct that WG Members do not have to have their name explicitly associated with any Full Consensus or Consensus view/position. However, in all other cases and in those cases where a group member represents the minority viewpoint, their name must be explicitly linked, especially in those cases where polls where taken.

Consensus calls should always involve the entire Working Group and, for this reason, should take place on the designated mailing list to ensure that all Working Group members have the opportunity to fully participate in the consensus process. It is the role of the Chair to designate which level of consensus is reached and announce this designation to the Working Group. Member(s) of the Working Group should be able to challenge the designation of the Chair as part of the Working Group discussion. However, if disagreement persists, members of the WG may use the process set forth below to challenge the designation.

If several participants[148] in a WG disagree with the designation given to a position by the Chair or any other consensus call, they may follow these steps sequentially:

1. Send email to the Chair, copying the WG explaining why the decision is believed to be in error.
2. If the Chair still disagrees with the complainants, the Chair will forward the appeal to the CO liaison(s). The Chair must explain his or her reasoning in the response to the complainants and in the submission to the liaison. If the liaison(s) supports the Chair's position, the liaison(s) will provide their response to the complainants. The liaison(s) must explain their reasoning in the response. If the CO liaison disagrees with the Chair, the liaison will forward the appeal to the CO. Should the complainants disagree with the liaison support of the Chair's determination, the complainants may appeal to the Chair of the CO or their designated representative. If the CO agrees with the complainants' position, the CO should recommend remedial action to the Chair.
3. In the event of any appeal, the CO will attach a statement of the appeal to the WG and/or Board report. This statement should include all of the documentation from all steps in the appeals process and should include a statement from the CO[149].

Who Can Participate in Consensus Designation:

Consensus calls or decisions are open to all Members who, where relevant, may consult as appropriate with their respective appointing organizations.

The WG Chair shall ensure that all perspectives are appropriately taken into account in assessing Consensus designations on the final recommendations.

Unless otherwise specified in this Charter, the GNSO Working Group Guidelines apply in full and Consensus designations are therefore the responsibility of the Work Group Chair and are to be made in accordance with the consensus levels described in Section 3.6 of the Working Group Guidelines.

Termination or Closure of Working Group:

Typically, the WG will close upon the delivery of its last Final Report, unless assigned additional tasks or follow-up by the GNSO Council.

The GNSO Council may terminate or suspend the WG prior to the publication of its last Final Report for significant cause such as changing or lack of community volunteers, the planned outcome for the project can no longer be realized, or when it is clear that no consensus can be achieved.

The WG Chair, in collaboration with the WG support staff and the GNSO Council Liaison, shall use an escalation procedure, which helps define the health of the WG and informs the GNSO Council's decision on whether the WG should be terminated or suspended.

[148] Any Working Group member may raise an issue for reconsideration; however, a formal appeal will require that a single member demonstrates a sufficient amount of support before a formal appeal process can be invoked. In those cases where a single Working Group member is seeking reconsideration, the member will advise the Chair and/or liaison of their issue and the Chair and/or liaison will work with the dissenting member to investigate the issue and to determine if there is sufficient support for the reconsideration to initial a formal appeal process.

[149] It should be noted that ICANN also has other conflict resolution mechanisms available that could be considered in case any of the parties are dissatisfied with the outcome of this process.

Section VII: Charter Document History

Version	Date	Description
1.0	19 December 2024	PDP WG Charter approved by the GNSO Council

Staff Contact:	Saewon Lee, John Emery, Steve Chan	Email:	saewon.lee@icann.org

Translations: If translations will be provided please indicate the languages below:											

Annex B Consensus Designations

Below is the LD PDP leadership team's designation as to the level of consensus on each recommendation in this Final Report. These designations were made following the process as outlined in the message to the LD PDP WG mailing list on 27 July 2026,[150] and in accordance with "Section 3.6 - Standard Methodology for Making Decisions of the GNSO Working Group Guidelines." By 6 August 2026, no objection was received from the LD PDP WG members to the leadership team's proposed consensus designations, hereby resulting in a "Full Consensus."[151]

Recommendation #	Leadership Team's Proposed Designation
Section 4.1 Charter Questions with Final Outputs	
Topic 1: Requirements for the Set at the Top-level	
Final Recommendation 1	Full Consensus
Topic 2: "Same Entity" Principle at the Top-level	
Final Recommendation 2	Full Consensus
Topic 3: Application Submission, Administrative Check, Initial Evaluation	
Final Recommendation 3	Full Consensus
Final Recommendation 4	Full Consensus
Final Recommendation 5	Full Consensus
Final Recommendation 6	Full Consensus
Final Recommendation 7	Full Consensus
Final Recommendation 8	Full Consensus
Implementation Guidance 9	Full Consensus
Final Recommendation 10	Full Consensus
Implementation Guidance 11	Full Consensus
Final Recommendation 12	Full Consensus

[150] See the message sent by Support Staff on behalf of the LD PDP leadership team – Initiating the Consensus Call.
[151] See the message sent by Support Staff on behalf of the LD PDP leadership team – Closing the Consensus Call.

Implementation Guidance 13	Full Consensus
Implementation Guidance 14	Full Consensus
Final Recommendation 15	Full Consensus
Final Recommendation 16	Full Consensus
Final Recommendation 17	Full Consensus
Topic 4: Contractual Requirements	
Final Recommendation 18	Full Consensus
Implementation Guidance 19	Full Consensus
Final Recommendation 20	Full Consensus
Final Recommendation 21	Full Consensus
Final Recommendation 22	Full Consensus
Final Recommendation 23	Full Consensus
Final Recommendation 24	Full Consensus
Final Recommendation 25	Full Consensus
Final Recommendation 26	Full Consensus
Final Recommendation 27	Full Consensus
Implementation Guidance 28	Full Consensus
Final Recommendation 29	Full Consensus
Topic 5: Delegation and Removal	
Final Recommendation 30	Full Consensus
Final Recommendation 31	Full Consensus
Final Recommendation 32	Full Consensus
Final Recommendation 33	Full Consensus
Final Recommendation 34	Full Consensus
Final Recommendation 35	Full Consensus
Implementation Guidance 36	Full Consensus

Final Recommendation 37	Full Consensus
Final Recommendation 38	Full Consensus
Implementation Guidance 39	Full Consensus
Final Recommendation 40	Full Consensus
Topic 6: Requirements for the Set at the Second-level	
Final Recommendation 41	Full Consensus
Final Recommendation 42	Full Consensus
Topic 7: “Same Entity” at the Second-level and IDN Table Harmonization	
Final Recommendation 43	Full Consensus
Implementation Guidance 44	Full Consensus
Final Recommendation 45	Full Consensus
Final Recommendation 46	Full Consensus
Final Recommendation 47	Full Consensus
Topic 8: Adjustments in Registration Processes Pertinent to the Domain Name Lifecycle	
Final Recommendation 48	Full Consensus
Final Recommendation 49	Full Consensus
Final Recommendation 50	Full Consensus
Final Recommendation 51	Full Consensus
Implementation Guidance 52	Full Consensus
Final Recommendation 53	Full Consensus
Final Recommendation 54	Full Consensus
Implementation Guidance 55	Full Consensus
Final Recommendation 56	Full Consensus
Implementation Guidance 57	Full Consensus

Annex C Stress Test: Edge Case Studies

Acknowledging the complexity of the topics and the technical issues involved, while also recognizing that gaps, instability, or problems could arise if policy and technical elements were not properly aligned, the LD PDP WG decided to conduct a Stress Test. The purpose was to identify and evaluate edge cases that may not have been considered while working with a limited scope or relying mainly on the prior bodies of work for guidance. Since it was considered that this exercise would only be meaningful once a draft set of recommendations had been developed, the WG conducted the Stress Test after the recommendations were formulated. Accordingly, this activity took place during ICANN84 in Dublin once Charter questions 1, 2, and 3 had been addressed and all relevant prior bodies of work reviewed and examined.

While conducting the Stress Test, the LD PDP WG resolved misjudged issues and highlighted edge cases that required further consideration. Once the Stress Test was completed, the LD PDP WG revisited any areas where the results did not align with the recommendations. In such instances, the WG deliberated on the topics again, revising and updating the recommendations, as necessary. If the WG concluded that an edge case was valid but not appropriate for inclusion in this effort, it was set aside and/or reserved for potential future work.

Below are the six potential edge case scenarios that were stress tested against to assess the soundness of the WG's preliminary recommendations, as it prepared for the publication of the Initial Report. Note that this work was conducted for the preliminary outputs and therefore, the numbering does not align with the final outputs in this report:

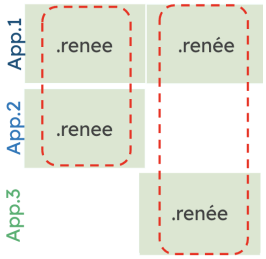
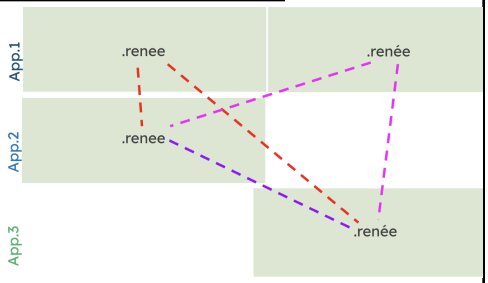
No.	Issue	Scenario	LD PDP WG's Agreement
1	If there are changes in Latin diacritics due to changes adopted in the language by a country/region, what will happen to those already delegated LD gTLDs?	Suppose a country/region adopts reform in its script and eliminates a diacritic or changes its use, does this change the already delegated LD gTLDs? Examples: - .çay → .chay - .pão → .pao	The LD PDP WG agreed that this issue is covered, to the extent necessary, and handled in its preliminary recommendations: ● Preliminary Recommendation 1.2: *"Per the Unicode Table, only characters that can be decomposed in this manner and appear within the table are eligible for the ASCII/Latin diacritic gTLD set."* ● Preliminary Recommendation 32: "*Consistent with Final Recommendation 8.7 from the EPDP-IDNs Phase 1 Final Report, 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, their delegated and allocated variant labels (if any), and their delegated and allocated ASCII/Latin diacritic gTLD set 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." ● Preliminary Recommendation 33: *"Consistent with Final Recommendation 8.8 from the EPDP-IDNs Phase 1 Final Report, in the unexpected event where a proposed update to the RZ-LGR is unable to retain full backward compatibility for validating any delegated gTLDs and their corresponding ASCII or Latin diacritic gTLD label(s) (if any), the relevant GP must call out the exception during a Public Comment period and explain the reasons for such exception..."* ● Implementation Guidance 34: *"...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 corresponding ASCII or Latin diacritic gTLD label(s) (if any) to be exempted. [...] Notwithstanding the recommendation to exempt 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."
2	If an LD gTLD of a corresponding .Brand ASCII gTLD is not allocated / delegated, but a different entity other than the current owner applies with permission from the .Brand TLD owner, can this be considered?	Suppose the owners of the following ASCII gTLD brands allow another entity to own the LD gTLD: <u>Examples:</u> - hermes → .hermès - .lancome→.lancôme	● Fundamentally, this issue/scenario conflicts with the "same entity" principle. ● Any applicant has a choice of applying separately or as a set: ○ If separately, the applications will be subject to String Similarity Review and most likely will get blocked/not get the TLD. Either way, this is out of LD PDP scope of work, thus irrelevant. ○ If applied as a set, the LD PDP WG agreed that this issue is covered, to the extent necessary, and handled in its preliminary recommendations: ● The relevant LD PDP preliminary recommendations are as follows: ○ <u>Preliminary</u>

			Recommendation 2: *"...all gTLDs that constitute an ASCII/Latin diacritic gTLD set can only be allocated to the same gTLD registry operator."* ○ Preliminary Recommendation 14.3: *"An applicant for a .Brand TLD string(s) that constitute(s) an ASCII/Latin diacritic gTLD set is required to submit proof that each label that constitutes the set is identical to registered trademarks owned and used by the gTLD registry operator or its affiliate."*
3	If a registry of a .Brand LD gTLD loses the brand legally, should we transfer or reserve LD gTLD to a new owner?	Suppose Registry A loses .Bránd legally. Should this LD gTLD be transferred or reserved to a new owner under the current LD PDP policy?	The LD PDP WG agreed that this issue is covered, to the extent necessary, and handled in its preliminary recommendations: ● Preliminary Recommendation 2: *"...all gTLDs that constitute an ASCII/Latin diacritic gTLD set can only be allocated to the same gTLD registry operator."* ● Preliminary Recommendation 14: *"...all gTLDs that constitute an ASCII/Latin diacritic gTLD set must be subject to the same application requirements and evaluation criteria. [...] 14.3 An applicant for a .Brand TLD string(s) that constitute(s) an ASCII/Latin diacritic gTLD*

			set is required to submit proof that each label that constitutes the set is identical to registered trademarks owned and used by the gTLD registry operator or its affiliate." ● Preliminary Recommendation 35: *"An ASCII gTLD that is removed from the root zone, either voluntarily or involuntarily, will result in the ASCII/Latin diacritic gTLD set no longer meeting requirements as described in Preliminary Recommendation 1. The removed gTLD(s) shall not be available for re-assignment or selection by an entity other than the one holding the remaining IDN gTLD in the ASCII/Latin diacritic gTLD set for at least 10 years following the removal. The gTLD registry operator may retain a single IDN gTLD and shall no longer be considered an ASCII/Latin diacritic gTLD set."* ● Preliminary Recommendation 36: *"A delegated Latin diacritic label that is voluntarily removed from the root zone will not require the removal of the associated ASCII gTLD or its other delegated Latin diacritic label(s). The removed Latin diacritic gTLD shall not be available for re-assignment or selection by an entity other than the one holding the remaining gTLD(s) in the ASCII/Latin diacritic gTLD set for at least 10 years following the removal. The gTLD registry*

			operator may retain a single ASCII gTLD and shall no longer be considered an ASCII/Latin diacritic gTLD set." • Preliminary Recommendation 38: "*Consistent with Final Recommendation 8.13 from the EPDP-IDNs Phase 1 Final Report, 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 ASCII/Latin diacritic gTLD set, if any, must also be removed from the root zone."*
4	Multiple applications are in contention with at least one gTLD from the ASCII/LD gTLD set application; Are all resolutions of that contention set viable?	Suppose the following 3 applications are in contention: - App.1: .renee and .renée - App.2: .renee - App.3: .renée  Are all resolutions of the contention set viable?	The LD PDP WG agreed that this matter is out of scope for the current work. Such scenarios may arise within the actual New gTLD Program and should be addressed according to the Program's established rules. Therefore, the resolution of these issues falls to the Program, and the WG will not develop or provide recommendations regarding potential contention scenarios. cf. Standard scenario: 
5	Applicants having an ASCII/LD gTLD set would also like to activate a variant of one of their	Suppose an applicant that owns an ASCII/LD gTLD set – .strasse and .strässe – would also like to	• The LD PDP WG discussed this issue and the next (Case Study 6) extensively, considering two (2) main options:

	TLDs; Can they do it? What policies apply – LD PDP, EPDP-IDNs, or both?	activate a variant of one of their TLDs. Is this possible and if so, what policies apply; LD PDP, EPDP-IDNs, or both?	○ Option 1. Restricting the variant activation within the ASCII/LD gTLD set. ○ Option 2. Allowing variant activation in the ASCII/LD gTLD set. ● In short, the WG members decided on Option 1 where an ASCII/LD gTLD contract cannot have variants added to it. The rationale behind this decision can be found below in Case Study 6. ● However, it was noted that under the current Latin script LGR, this scenario is not possible, since the only allocatable variant relationships in the Latin LGR are those involving Turkish dotless “ı” and the sharp “ß,” and .sträße and .strasse do not qualify as an ASCII/LD gTLD set.
6	Applicants having a Variant domain set would also like to activate a LD gTLD for one of their TLDs; Can they do it? What policies apply – LD PDP, EPDP-IDNs, or both?	Suppose an applicant with an existing Variant domain set – .straße and .strasse – would like to add .strässe to its existing gTLD .strasse. Is this possible and if so, what policies apply; LD PDP, EPDP-IDNs, or both?	● For this issue, the LD PDP WG had to consider whether a base ASCII gTLD should be standalone, where the requirement, then, would be that it must not be a part of an existing Variant domain set. ● This issue was also discussed at length by the WG, considering the two (2) main options introduced through Case Study 5 above: ○ Option 1. Restricting the ASCII/LD gTLD set activation to single ASCII TLDs and not for Variant domain sets. ○ Option 2. Allowing ASCII/LD Set

			activation for TLDs within a Variant domain set. ○ The summary of WG discussions, including the pros and cons of each option is posted on wiki here: https://icann-community.atlassian.net/wiki/x/BIDgJw ● Though Option 2 of allowing activation of ASCII/LD Sets for TLDs within a Variant Domain Set (and vice versa) was considered more natural and complete – rather than prohibiting such cases – the WG members recognized that given the current limited scope of work and the fact that concurrent operation of the ASCII/LD gTLD Set and the Variant Domain Set has never been practiced, such an approach could introduce safety and security risks for the DNS. Moreover, accommodating scenarios that may never arise in real-world operations could significantly complicate and delay the work; this includes, many preliminary recommendations aligned with EPDP-IDNs may need to be revisited, reconsidered, and revised, potentially affecting the EPDP-IDNs rules already adopted by the ICANN Board and under implementation for the Next Round. ● In short, though it was challenging to reach an agreement, the WG

			members decided on Option 1 – a variant contract cannot have any ASCII/LD gTLDs added to it (and vice versa like in Case Study 5 – an ASCII/LD gTLD contract cannot have variants added to it). ● Accordingly, this restriction was explicitly incorporated into the final clause of Preliminary Recommendation 1, resulting in the following language: *"1.5 None of the gTLD strings that constitute an ASCII/Latin diacritic gTLD set may be part of a Variant TLD set."* ● If Full Consensus on this recommendation is not reached during the Consensus Call, Minority View will be received by the proponent, which will be documented in the Final Report. ● Meanwhile, the LD PDP WG noted that future versions of the RZ-LGR may change such scenarios in the future. In addition, the WG accepted that any unresolved issues can be addressed through future work.

Annex D Background

This section summarizes key milestones related to the introduction of Latin script diacritics, which also dates back to the introduction of IDNs and events related to the launch of the New gTLD Program. Therefore, most key milestones are taken from EPDP-IDNs and its background.

2003: IDN Registrations at the Second-Level

In 2003, the Internet Engineering Task Force (IETF) developed IDNA2003, the standard which first enabled domain names to contain non-ASCII Unicode characters. In the same year, ICANN and leading IDNs registries collaboratively developed IDN Implementation Guidelines version 1.0, which were then endorsed by the ICANN Board.[152] ICANN subsequently began authorizing registries, having agreements with ICANN to deploy IDNs at the second-level according to the provisions of the Guidelines. The Guidelines required registries to work collaboratively with relevant and interested stakeholders to develop language-specific registration policies (including, where the registry determines appropriate, character variant tables), with the goal of achieving consistency in IDN implementation efforts for the benefit of DNS users worldwide.

2007: Groundwork for IDN gTLDs at the Top-Level

In 2007, the GNSO's Final Report on the Introduction of New Generic Top-Level Domains included the following outputs on IDNs, laying the groundwork for the introduction of IDN gTLDs:[153]

- Principle B: Some new generic top-level domains should be IDN) subject to the approval of IDNs being available in the root.
- Principle C: The reasons for introducing new top-level domains include that there is demand from potential applicants for new top-level domains in both ASCII and IDN formats.
- Recommendation 18: If an applicant offers an IDN service, then ICANN's IDN Guidelines must be followed.

2009: Introduction of IDN ccTLDs at the Top-Level

In 2009, the ICANN Board approved the Final Implementation Plan for the ccTLD Fast Track Process, which was based on a proposal produced by the Internationalized Domain Names

[152] IDN Implementation Guidelines version 1.0: https://www.icann.org/resources/pages/idn-guidelines-2003-06-20-en; ICANN Board resolution that endorsed the IDN Implementation Guidelines: https://www.icann.org/en/board-activities-and-meetings/materials/minutes-regular-meeting-of-the-board-rio-de-janeiro-27-03-2003-en#InternationalizedDomainNames

[153] Final Report on Introduction of New Generic Top-Level Domains: https://gnso.icann.org/en/issues/new-gtlds/pdp-dec05-fr-parta-08aug07.htm

Working Group (INDC WG).[154] The Fast Track Process enabled countries and territories to submit requests to ICANN for IDN ccTLDs representing their respective country or territory names in scripts other than Latin, introducing IDNs to the top level for the first time. With ccPDP4 tasked to evolve the Fast Track Process, which involved the Latin script, the scope of IDNC WG was limited to non-Latin scripts to not pre-empt any outcomes of the PDP. To date, 61 IDN ccTLDs have been delegated.

2010: No Top-Level Variant gTLDs Delegated in the New gTLD Program

In 2010, as preparations were underway for the launch of the New gTLD Program, the ICANN Board resolved that *"...no variants of gTLDs will be delegated through the New gTLD Program until appropriate variant management solutions are developed."*[155] The Board directed ICANN's CEO to develop an issues report *"identifying what needs to be done with the evaluation, possible delegation, allocation and operation of gTLDs containing variant characters IDNs as part of the new gTLD process in order to facilitate the development of workable approaches to the deployment of gTLDs containing variant characters IDNs."*[156]

2012: "Gaps" with Respect to IDN Variant TLDs

In 2012, the IDN Variant Issues Project produced "A Study of Issues Related to the Management of IDN Variant TLDs (Integrated Issues Report)," which collated issues associated with the possible inclusion in the DNS root zone of IDN variant TLDs.[157] The Study identified two gaps:

1. No definition of IDN variant TLDs.
2. No IDN variant TLD management mechanism.

2012: New gTLD Program 2012 Round: IDNs at the Top-Level

Also in 2012, the New gTLD Program launched, providing the first opportunity to apply for IDN gTLDs. A total of 116 IDN gTLD applications were received during the 2012 application round. Ninety-two (92) IDN gTLDs were ultimately delegated. While variant gTLDs were not delegated as part of the 2012 round, applicants were invited to declare any variants of the applied-for string in

[154] Final Implementation Plan for the ccTLD Fast Track Process published at the time (2009): https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-16nov09-en.pdf (Most recent updated version as of 2019: https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf); ICANN Board resolution that approved the Fast Track Process implementation plan: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-of-directors-seoul-30-10-2009-en#2; INDC WG: https://ccnso.icann.org/en/workinggroups/idncwg.htm

[155] ICANN Board resolution regarding gTLD variant labels: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-special-meeting-of-the-board-of-directors-25-09-2010-en#2.5

[156] Ibid.

[157] Integrated Issues Report: https://www.icann.org/en/system/files/files/idn-vip-integrated-issues-final-clean-20feb12-en.pdf

the application. Declaring variant strings was for information purposes only and did not imply any right or claim to the declared variant strings.

2013: Procedure for Developing Root Zone Label Generation Rules

In 2013, the ICANN Board resolved to implement the procedure for developing RZ-LGR, which aimed to address the previously identified gap 1 that there was no definition of IDN variant TLDs.[158] Generation Panels started developing proposals for script-specific LGR that define a set of parameters that determine valid IDN labels and their variants for the root zone.

2019: Recommendations for Variant TLD Management

In 2019, to address that there was no IDN variant management mechanism – the previously identified gap 2 – ICANN org published Recommendations for Managing Internationalized Domain Name Variant Top-Level Domains ("Staff Paper"), which the Board subsequently approved.[159] In its resolution approving the Staff Paper, the Board requested that *"the ccNSO and GNSO take into account the Variant TLD Recommendations while developing their respective policies to define and manage the IDN variant TLDs for the current TLDs as well as for future TLD applications."*

2020: Recommendations for the Technical Utilization of the RZ-LGR

In addition, to further address the gap 2 that there was no IDN variant management mechanism, the ICANN Board asked the ICANN community to study and recommend how to technically apply the RZ-LGR in a harmonized way to all TLDs. The RZ-LGR Technical Study Group (TSG) developed Recommendations for the Technical Utilization of the RZ-LGR, which the Board approved in 2020.[160]

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[158] Procedure for developing the RZ-LGR: https://www.icann.org/en/system/files/files/lgr-procedure-20mar13-en.pdf; ICANN Board resolution that adopted the procedure: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-of-directors-11-04-2013-en#2.a

[159] Staff Paper: https://www.icann.org/resources/pages/idn-variant-tld-implementation-2018-07-26-en; Board resolution that adopted the recommendations in the Staff Paper: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-14-03-2019-en#2.a

[160] Recommendations for the Technical Utilization of the RZ-LGR: https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf; ICANN Board resolution that adopted the recommendations: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-open-session-of-board-workshop-los-angeles-regular-meeting-of-the-icann-board-26-01-2020-en#1.c; TSG: https://community.icann.org/display/croscomlgrprocedure/Study+Group+on+Technical+Use+of+RZ-LGR

2021: Recommendations for Future Rounds of the New gTLD Program

In February 2021, the GNSO New gTLD SubPro PDP WG published its Final Report, which includes hundreds of Outputs on 42 topics related to the future of the New gTLD Program.[161] IDNs were addressed in Topic 25 of the Final Report.

2021: Policy Development Related to IDN Variant TLDs

In May 2021, the GNSO approved the Charter of the EPDP on IDNs, which was expected to develop recommendations by building on the existing body of policy work, research, and analysis on the IDN subject.[162] The EPDP-IDNs Team began meeting in August 2021. The EPDP-IDNs Team also established a small group dedicated to the deliberation on String Similarity Review-related charter questions.

In August 2021, the ccNSO Council approved the Charter for the ccPDP4, which is tasked to recommend a policy for the selection and deselection of IDN ccTLD strings.[163] The outcomes of the ccPDP4 are expected to eventually replace the IDN ccTLD Fast Track Process. The ccPDP was chartered to include a sub-group specifically focused on variant management of IDN ccTLD strings, as well as a sub-group focused on the review of confusingly similar strings. Those topics overlapped with the topics specified in the EPDP-IDNs Charter.

Per the ICANN Board's request that the GNSO and the ccNSO keep each other informed of their respective progress in developing the relevant details of and policies and procedures on IDN variant TLD management, the EPDP-IDNs Team and ccPDP4 appointed liaisons to each other.[164] Both groups also met periodically to discuss the alignment of their draft recommendations.

2022: ICANN Published RZ-LGR Version 5 and IDN Implementation Guidelines Version 4.1

In May 2022, ICANN published the RZ-LGR version 5, which covers 26 scripts: Arabic, Armenian, Bangla, Chinese (Han), Cyrillic, Devanagari, Ethiopic, Georgian, Greek, Gujarati, Gurmukhi,

[161] See SubPro Final Report at https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf
[162] EPDP-IDNs Charter: https://gnso.icann.org/sites/default/files/policy/2021/presentation/CharterGNSOIDNsEPDPWorkingGroup20May21.pdf
[163] ccPDP4 Charter: https://community.icann.org/download/attachments/138969190/Draft%20Charter%20ccPDP4%20WG.pdf?version=1&modificationDate=1592141220002&api=v2
[164] ICANN Board resolution that requested coordination between GNSO and ccNSO on the IDN related policy development: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-14-03-2019-en#2.a

Hebrew, Japanese (Hiragana, Katakana, and Kanji [Han]), Kannada, Khmer, Korean (Hangul and Hanja [Han]), Lao, Latin, Malayalam, Myanmar, Oriya, Sinhala, Tamil, Telugu, and Thai.[165]

In November 2022, ICANN published IDN Implementation Guidelines version 4.1 after approval by the ICANN Board.[166] The ICANN Board deferred implementation of Guidelines 6a, 11, 12, 13, 18 in version 4.0 as they overlapped with ongoing work through the EPDP-IDNs Team.[167] The ICANN Board, then, directed ICANN org to publish the non-deferred guidelines in 4.0 as version 4.1.

2023: ICANN Board Kicked Off SubPro Implementation

In March 2023, during the ICANN76 Public Meeting, the ICANN Board adopted a substantial portion of the Outputs in the SubPro PDP Final Report and officially kicked off implementation efforts to prepare for launching the next application round of the New gTLD Program.[168] The Outputs adopted by the ICANN Board included all the IDN recommendations in Topic 25 of the SubPro PDP Final Report.

2023: GNSO Council Adopted the EPDP-IDNs Phase 1 Final Report

After kicking off the implementation efforts for SubPro, the ICANN Board requested the EPDP-IDNs Team to deliver an updated project plan by the last day of the ICANN77 Public Meeting (15 June 2023) that identifies all character questions that will impact the next AGB of the New gTLD Program, as well as a new timeline for the EPDP-IDNs Team's delivery of relevant recommendations to the GNSO Council. The GNSO Council submitted this deliverable to the ICANN Board during ICANN77 and provided an updated timeline in July 2023.[169] The EPDP-IDNs Team had already bifurcated its work into two phases to best prepare for the New gTLD Program: Next Round and avoid any potential delays that may affect the implementation work; EPDP-IDNs Phase 1 was to focus on topics related to top-level gTLD definition and management. Consequently, the GNSO Council approved the EPDP-IDNs Phase 1 Final Report[170] on 21 December 2023,[171] including all 69 Outputs.

[165] RZ-LGR version 5: https://www.icann.org/resources/pages/root-zone-lgr-2015-06-21-en

[166] IDN Implementation Guidelines version 4.1: https://www.icann.org/en/system/files/files/idn-guidelines-22sep22-en.pdf; ICANN Board resolution that approved the IDN Implementation Guidelines version 4.1: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-22-09-2022-en#2.d

[167] Proposed IDN Implementation Guidelines version 4.0: https://www.icann.org/en/system/files/files/idn-guidelines-10may18-en.pdf

[168] ICANN Board resolution that partially adopted the SubPro PDP Outputs: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-16-03-2023-en

[169] See details in the GNSO Council deliverable submitted during ICANN77 at https://www.icann.org/en/system/files/correspondence/ducos-to-sinha-15jun23-en.pdf; See the updated GNSO Council deliverable at https://www.icann.org/en/system/files/correspondence/ducos-to-sinha-25jul23-en.pdf

[170] See EPDP-IDNs Phase 1 Final Report at https://gnso.icann.org/sites/default/files/policy/2023/correspondence/epdp-idns2-leadership-team-et-al-to-gnso-council-et-al-08nov23-en.pdf

[171] See GNSO Council resolution at https://gnso.icann.org/en/council/resolutions/2020-current#202312

2024: GNSO Council Delivered EPDP-IDNs Phase 2 Final Report to the ICANN Board

EPDP-IDNs Phase 2 focused on topics related to second-level variant management. Accordingly, the GNSO Council approved all 20 Outputs (14 recommendations and 6 implementation guidance) pertaining to second-level variant management documented in the Phase 2 Final Report[172] on 13 November 2024,[173] delivering the Recommendations Report[174] to the ICANN Board in December 2024. As of 2025, EPDP-IDNs Phase 2 Final Report is pending final decision by the ICANN Board.

2024: GNSO Council Initiated a PDP for Latin Script Diacritics

On 16 May 2024, the GNSO Council requested an Issue Report, recognizing an issue to be examined in Latin script diacritics where an ASCII gTLD and the LD version of the gTLD are not variants of each other and may be found visually similar to each other; there was a need to explore whether they could coexist, and if so, to identify those potential mechanisms for doing so. The Preliminary Issue Report[175] received 41 Public Comment submissions during the Public Comment period between July and August 2024, prompting a Final Issue Report[176] that was delivered to the GNSO Council on 12 September 2024. Following the presentation of the WG Charter and subsequent discussion on 17 October 2024, the GNSO Council initiated a PDP for Latin script diacritics on 13 November 2024.[177]

2025: ICANN Board Adopted the EPDP-IDNs Phase 1 Final Report

After receiving the GNSO Council-approved EPDP-IDNs Phase 1 Final Report[178] in January 2024,[179] the ICANN Board initially adopted 52 of the 58 final recommendations on 8 June 2024. On 7 September 2024, the Board adopted 56 final recommendations in total, pending adoption on fee

[172] See EPDP-IDNs Phase 2 Final Report at https://gnso.icann.org/sites/default/files/policy/2024/draft/gnso-idn-epdp-phase2-final-report-07oct24-en.pdf
[173] See GNSO Council resolution at https://gnso.icann.org/en/council/resolutions/2020-current#202411
[174] See EPDP-IDNs Phase 2 Recommendations Report: https://gnso.icann.org/sites/default/files/policy/2024/presentation/epdp-idns-recommendations-report-09dec24-en.pdf
[175] See Preliminary Issue Report for Latin Script Diacritics at https://gnso.icann.org/sites/default/files/policy/2024/draft/preliminary-issue-report-latin-script-diacritics-17jul24-en.pdf
[176] See Final Issue Report for Latin Script Diacritics at https://gnso.icann.org/sites/default/files/policy/2024/draft/final-issue-report-pdp-latin-diacritics-12sep24-en.pdf
[177] See GNSO Council resolution at https://gnso.icann.org/en/council/resolutions/2020-current#202411
[178] See EPDP-IDNs Phase 1 Final Report at https://gnso.icann.org/sites/default/files/policy/2023/correspondence/epdp-idns2-leadership-team-et-al-to-gnso-council-et-al-08nov23-en.pdf
[179] See GNSO Council resolution at https://gnso.icann.org/en/council/resolutions/2020-current#202401

structure related recommendations.[180] Finally, the remaining two recommendations were resolved on 30 October 2025,[181] with all 58 final recommendations from EPDP-IDNs Phase 1 ready for implementation.

2026: New gTLD Program: 2026 Round is Launched

ICANN's New gTLD Program: 2026 Round launched on 30 April 2026. Established to enable the expansion of the Internet's unique identifier system through the introduction of new top-level domains, this marks the second opportunity since the initiative first launched in 2012. For this Round, guidelines and provisions for variant gTLDs have been established, opening new doors for the consideration and potential delegation of Variant Sets. Although LD gTLDs are not classified as variants gTLDs, they will be treated and function in a similar manner, reflecting the approach taken from the EPDP-IDNs. Therefore, the inclusion of the variant gTLDs in this Round through the 2026 AGB represent a significant step forward and a huge milestone, laying the groundwork for the future recognition and inclusion of LD gTLDs and the ASCII/LD gTLD Sets. The application window for the 2026 Round closed on 12 August 2026.

2026: LD PDP WG Developed 57 Final Outputs

With the initiation of the PDP in November 2024, the WG's Charter was adopted on 19 December 2024. Subsequently, membership was established and the LD PDP WG held its Kick-off Meeting on 8 March 2025 during ICANN82 in Seattle. The project plan was approved by the GNSO Council on 10 April 2025, with the WG remaining focused on maintaining a narrow scope centered on examining a single issue: In circumstances where a base ASCII gTLD and the LD version of the gTLD are not variants of each other, what mechanism is needed in order to allow a single registry operator to simultaneously operate both gTLDs? On 12 January 2026, the LD PDP WG published its Initial Report for Public Comment. Following the Public Comment, the WG has now developed 57 final recommendations and implementation guidance through this Final Report for Council's consideration.

[180] See ICANN Board resolution at https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-07-09-2024-en#section2.a

[181] See ICANN Board resolution at https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-30-10-2025-en#section2.c

Annex E LD PDP WG Membership/Attendance

The LD PDP WG uses an "Open Model," allowing for all interested parties to participate. Since the Council anticipated a limited number of ICANN community members to have prerequisite knowledge, background, expertise, and interest in the subject matter, it sought to limit barriers to participation. For details of the WG model and membership structure, please refer to "Section 4. Formation, Staffing, and Organization" in the WG Charter which is presented in "Annex A" of this report.

The list of the WG members can be found on wiki here, along with their Statements of Interest (SOIs): https://icann-community.atlassian.net/wiki/x/4APVBg. Their attendance data and metrics are presented in the next page.

ICANN org Staff Support for the LD PDP WG is listed as follows:

LD PDP WG Policy Support	LD PDP WG Operational Support	ICANN Org Liaison
Saewon Lee	Devan Reed	Ariel Liang
John Emery	Terri Agnew	Isabelle Colas-Adeshina
Steve Chan	Julie Bisland	Sarmad Hussain
		Pitinan Kooarmornpatana

The WG email archives can be found at
https://lists.icann.org/hyperkitty/list/gnso-latin-diacritics@icann.org/

Below is the summary of regular meetings held for LD PDP WG:

Plenary Meetings

- 40 Plenary calls (4 of which were cancelled) for a total of 48 actual meeting hours[182]

Leadership Meetings

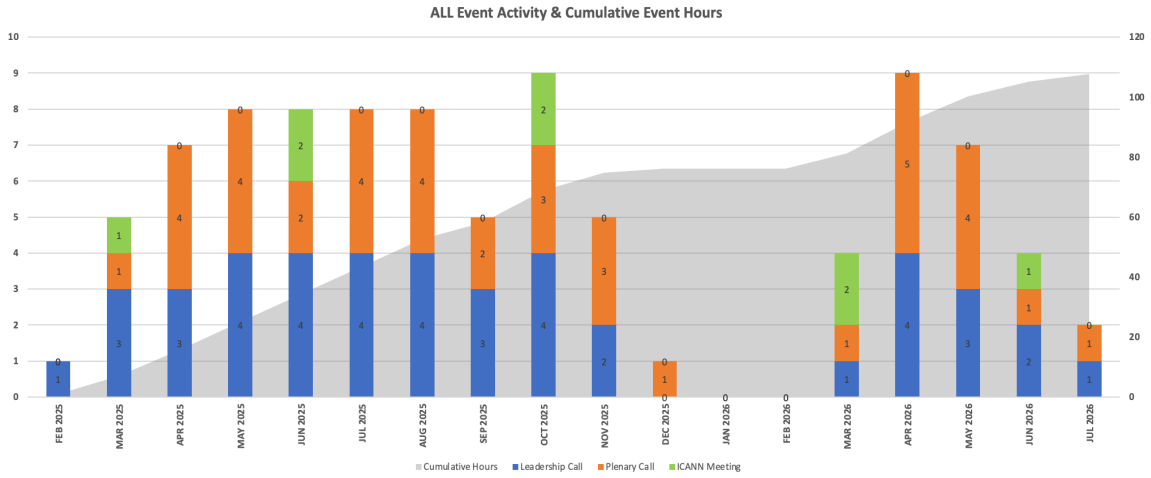
- 43 Leadership calls (2 of which were cancelled) for a total of 43 actual meeting hours

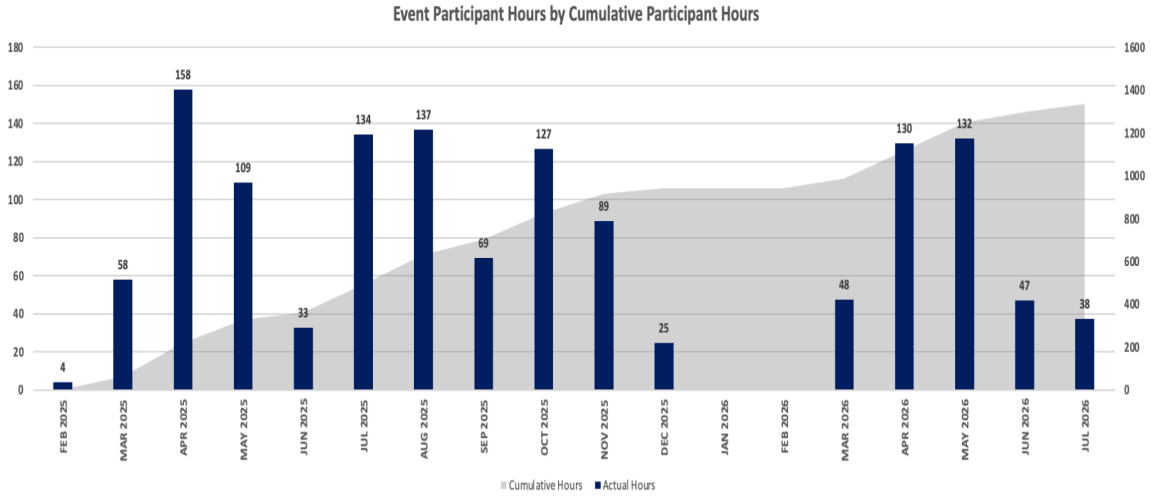
Overall Meeting Activities

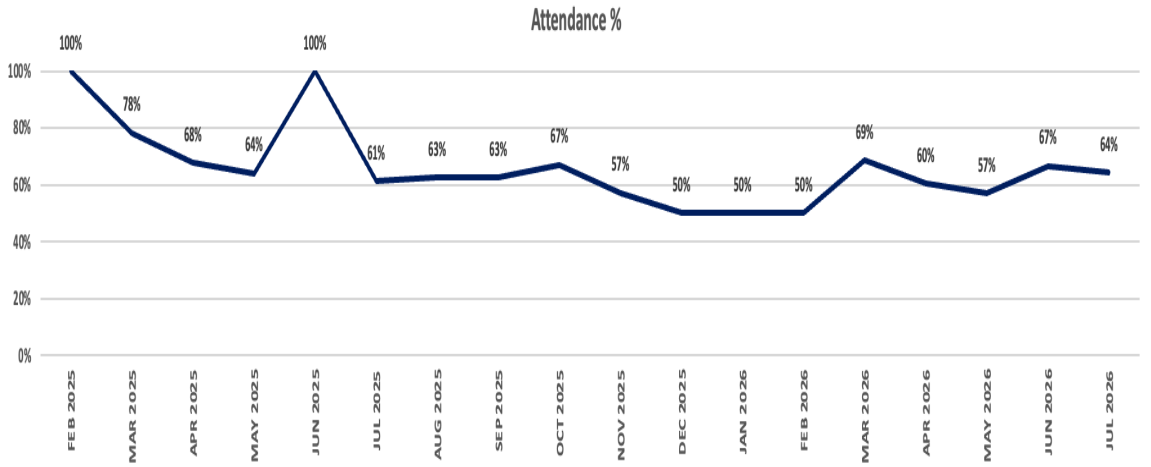
- 83 total meetings (with 6 cancelled) for a total of 96.6 meeting hours and 1,336 participant hours
- 53% attendance rate of members for all 77 meetings
- 8 total face-to-face sessions for a total of 11 meeting hours, across 5 ICANN Public Meetings (ICANN82-86)

[182] The wiki meetings page – and WG Meetings – record 39 Plenary calls, with 3 marked as cancelled. The discrepancy arises because the meeting invite was initially sent and entered into the CES, but later got deleted from the wiki – and not counted either for the actual meetings – after the meeting was cancelled. In both records, the completed meetings still account for a total of 36.

LD PDP WG Activity Metrics:







LD PDP WG Membership and Attendance:

	Invited	Attended	Percent	Role	SOI	Start Date	Depart Date
Member	**1230**	**652**	**53.0%**				
BC	**118**	**87**	**73.7%**				
Asteway Shoarega Negash	36	25	69.4%		SOI	15.01.2025	
Mark William Datysgeld	82	62	75.6%	Vice Chair	SOI	16.01.2025	
GNSO Council	**87**	**61**	**70.1%**				
Prudence Malinki	64	44	68.8%	Liaison	SOI	24.02.2025	
Christian Dawson	23	17	73.9%	Liaison	SOI	07.01.2026	
ISPCP	**72**	**61**	**84.7%**				
Anil Kumar Jain	36	31	86.1%		SOI	28.01.2025	
Philippe Fouquart	36	30	83.3%		SOI	27.01.2025	
NCSG	**144**	**69**	**47.9%**				
Emmanuel Nnaemeka Vitus	36	3	8.3%		SOI	14.01.2025	
James Kunle Olorundare	36	5	13.9%		SOI	23.01.2025	
Juliana Harsianti	36	31	86.1%		SOI	29.01.2025	
Tapani Tarvainen	36	30	83.3%		SOI	23.01.2025	
RrSG	**84**	**84**	**100.0%**				
Michael Bauland	84	84	100.0%	Chair	SOI	15.01.2025	
RySG	**216**	**127**	**58.8%**				
Amadeu Abril	36	30	83.3%		SOI	22.01.2025	
Claude Ménard	36	36	100.0%		SOI	17.01.2025	
Dario Janeiro	36	0	0.0%		SOI	03.02.2025	
Edmon Chung	36	15	41.7%		SOI	11.03.2025	
Louis Houle	36	35	97.2%		SOI	21.01.2025	
Sebastien Ducos	36	11	30.6%		SOI	29.01.2025	
ICANN Board	**26**	**19**	**73.1%**				
Alan Barrett	26	19	73.1%	Liaison	SOI	24.06.2025	28.05.2026
Amitabh Singhal	0	0	0.0%	Liaison	SOI	07.07.2026	
NARALO	**72**	**41**	**56.9%**				
Bill Jouris	36	36	100.0%		SOI	27.01.2025	
Bridget Chase	36	5	13.9%		SOI	29.01.2025	
GAC	**132**	**26**	**19.7%**				
David Bedard	36	10	27.8%		SOI	24.01.2025	
Hazem HEZZAH	36	4	11.1%		SOI	23.01.2025	
Isabel Gates	25	1	4.0%		SOI	22.01.2052	12.01.2026
Rudy Nolde	35	11	31.4%		SOI	23.03.2025	

LACRALO	**144**	**9**	**6.3%**				
Harold Arcos	36	4	11.1%		SOI	19.03.2025	
Sergio Salinas Porto	36	0	0.0%		SOI	16.01.2025	
Sylvia Herlein Leite	36	0	0.0%		SOI	16.01.2025	
Sandra Rodriguez Dominguez	36	5	13.9%		SOI	15.01.2025	
APRALO	**63**	**50**	**79.4%**				
Harsha Wijayawardhana	17	8	47.1%		SOI	06.10.2025	
Justine Chew	10	7	70.0%		SOI	01.04.2025	24.07.2025
Sathees Babu Chellikattuveli Sivanandan	36	35	97.2%		SOI	29.01.2025	
AFRALO	**72**	**19**	**26.4%**				
Raymond Selorm Mamattah	36	8	22.2%		SOI	27.01.2025	
Maureen Owusu-Addae	36	11	30.6%		SOI	19.02.2025	
Grand Total	**1230**	**652**	**53.0%**				

Annex F Community Input

1. Request for Input

According to the GNSO's PDP Manual, a PDP WG should formally solicit statements from each GNSO SG/C at an early stage of its deliberations. A PDP WG is also encouraged to seek the opinion of other ICANN SOs and ACs who may have expertise, experience, or an interest in the issue. This step of the process is called "Request for SG/C/SO/AC Input," also commonly referred to as, "Request for Early Input."

Per this direction, the LD PDP WG reached out to all ICANN SOs and ACs as well as all GNSO SGs and Cs with requests for input at the start of its deliberations. In response, statements were received from the:

- Registrars Stakeholder Group (RrSG)
- The Internet Service Providers and Connectivity Providers Constituency (ISPCP)

Their full statements can be found here: https://icann-community.atlassian.net/wiki/x/NATVBg

2. Review of Input Received

All of the Early Input statements received were added to the relevant working documents and considered by the LD PDP WG as part of its deliberations on each topic.