

Report of Public Comments

Title:	IDN Variant Issues Project - Proposed Project Plan for Next Steps																	
Publication Date:	15 May 2012																	
Prepared By:																		
Comment Period:		Important Information Links																
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Time (UTC):	23:59	View Comments Submitted																
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Section I: General Overview and Next Steps																		
<p>The goal of the IDN Variant TLD Program is to define the necessary processes that must be in place to enable the management of variant TLDs. The recently completed IDN Variant Issues Project documented the issues associated with the potential inclusion of IDN variant TLDs in the DNS root zone with the publication of the final Integrated Issues Report on 20 February 2012. ICANN then created the Proposed Project Plan for Next Steps, posted it for public comment, and presented it in a session at the ICANN meeting in Costa Rica in March 2012. Based on the input received, the project plan has been revised, renamed the IDN Variant TLD Program, and posted for another round of public comment.</p>																		
Section II: Contributors																		
<p><i>At the time this report was prepared, a total of four (4) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.</i></p>																		
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Section III: Summary of Comments																		

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

(RySG) This comment requested an extension of the Public Comment Period.

(CD) The comment suggested inclusion of additional scripts such as Thai and Hebrew which were not included in the six scripts studied in the first phase of the IDN Issues project. The commenter also suggested that projects 1 & 3 listed in the proposed project plan need community volunteer resources and suggested the creation an IDN issues program noting that such program can be used to also address non-variant IDN issues.

(INTA) This comment contained a number of points:

- Agreement that further study of variants is needed.
- The commenter emphasized that variants are justified as a means to minimize user confusion and fraudulent use, and not to merely increase availability of additional variant domains as alternatives to those already available.
- On Project 3, the use of character-level variants should be prioritized over whole-string variants implementation, as they offer a stronger basis in identifying potentially conflicting uses.
- On Project 5, the “Mirroring Variants Feasibility” study was supported and raised concerns about active variants without mirroring.

(CDNC) The CDNC noted the VIP statement concerning the December 2012 deadline to present a decision on variant TLDs delegation possibilities and made the following comments about projects 3 & 5.

- With reference to Project 3, the ‘whole-string variants’ do not impact the Chinese variants, and as pointed out that per the final Integrated Issues Report, this issue is not of high importance to all scripts. The VIP team should consider this as an individual case study issue in order to not impede progress with character-based variants implementation.
- With reference to Project 5, the CDNC concluded that parallel provisioning is the desired approach to address Chinese variant issues. This necessitates the delegation of primary and preferred variants to the same applicant/registrant. CDNC noted that feasibility of mirroring study should not delay the delegation of variants for the Chinese community. CDNC also observed that not all scripts view mirroring as essential and therefore the delegation of variants should not be delayed while waiting for the study results.
- Comment also emphasized that project should not disadvantage any language/script communities with different levels of experience with IDN variant issues. Therefore, work should be directed towards establishing an IDN variants implementation process framework to allow language/script communities to proceed through it separately; timelines are also advised. Chinese variant implementation readiness is emphasized.

(ALAC) This comment contained a number of points:

- The program approach and timeline seem to disadvantage certain communities who are more ready to implement IDN TLD variants. The program also lacks a process and for communities to demonstrate their readiness to implement IDN variants.
- Recommendation to create a framework with guidelines to help communities develop their IDN variant implementation policies and plans.
- Recommendation to develop an IDN variant implementation process, timing and criteria for ready-to-implement communities.
- ALAC also met with the VIP team after the Costa Rica meeting and recognized that the team is making changes to the proposed plan based on input received thus far. ALAC requested further detail from the VIP team on updates being made to the revised program plan. This includes information about the type of variants to implement, anticipated timeline to do so and more elaboration on the anticipated costs.

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

Expanding scripts

A comment suggested that additional scripts should be included in the project going forward. This is agreed, and it is intended that future project phases would, at an appropriate time, include a broader set of script expertise than was used for the case studies and identification of issues. Because of the work already accomplished, consideration of more scripts will be able to move ahead more rapidly.

Support for variants to minimize user confusion and fraudulent uses

Comments expressing support for implementation of IDN variant TLDs correctly pointed out that management of variant TLDs will have an impact on the user experience. The variant work is being undertaken not merely to expand the usability of many languages in the DNS, but also to ensure that coordinated attention is given to issues of user confusion and minimizing user vulnerabilities. Note that the concept of active variants without mirroring still implies the allocation of the variants to the same entity, thereby eliminating the opportunity for and likelihood of confusing use, misuse or fraudulent use.

Prioritization of code point variants over whole-string variants

Comments indicated that whole-string variants should be a lower priority in general, and the updated plan has de-prioritized this project. As noted in the updated project plan, whole string variants may be of concern to some communities, and ICANN may re-visit this project if techniques for reliably and unambiguously handling such whole string variants are identified.

Individual community needs

These comments suggested that mirroring would not be necessary in the Chinese case, and that desired objectives could be accomplished by “parallel provisioning.” Parallel provisioning is

considered in the [Integrated Issues Report](#) as one of the potential components of a mirroring solution. The comments indicated that Chinese variant TLDs could be delayed by studying mirroring feasibility. The mirroring study has been de-prioritized in the project plan, due to technical commentary that mirroring (not just DNS mirroring) does not seem feasible with current technology as described in the [Integrated Issues Report](#).

IDN Tables (Project 1)

One comment suggested a need for community involvement in Project 1, concerning development of a standard format for root IDN tables. This is agreed, and this project is being developed in the IETF context, where community involvement is part of the process.

Advantaging and Disadvantaging Script Communities

Comments noted that it is important to note that various script communities may have differing degrees of study and experience with regard to variant code points. These comments suggested that an approach allowing various script communities to proceed according to different timelines would be desirable. As noted in the Integrated Issues Report, the root zone is a shared resource, and the management of the root zone should accommodate, to the maximum extent possible, the needs of users of multiple global scripts. Taking into account as far as possible the unique needs of each script, principles of fair and equitable treatment should be adhered to, avoiding undue consideration for users of particular languages and scripts in a space that is used by all.

It is unclear how the program approach disadvantages certain communities, as suggested by one comment. The readiness of the root zone to apply policies and procedures to all global users must be a basis for further implementation based on specific community needs, e.g., language or script community. The goals of projects 2 and 6 are to create this capability.

Comments suggested an implementation process for IDN variant TLDs based on readiness of certain communities. This appears premature at the present time, as the implementation process has not been established. Whether it is possible or desirable to permit different communities to proceed at different speeds will likely be determined by the results of the proposed project P2.1 (“Process for IDN Table Creation and Maintenance of the Root”). It should in any case be noted that there is no agreed definition of what constitutes “readiness” for IDN TLDs. For there to be a process to demonstrate “readiness,” a specification is required of what technical or other criteria must be met. In the interest of moving forward, this work is included in the set of projects defined in the program plan.

It is understood that variant management is a significant element of using many scripts and languages in the DNS. This is the reason for the reorganization of the project plan to focus on those areas on the critical path to establishing variant TLDs, and to do work in parallel so that time and community resources can be used most efficiently.

Suggestions concerning education and the development of guidelines to help communities are very helpful, and it is agreed that such initiatives should be supported.