

# Report of Public Comments

<b>Title:</b>	Variant Issues Project – Cyrillic Case Study Report	
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<b>Prepared By:</b>	The report was prepared by the Cyrillic Case Study Team within the Variant Issues Project (see <a href="http://www.icann.org/en/announcements/announcement-06oct11-en.htm">http://www.icann.org/en/announcements/announcement-06oct11-en.htm</a> ).	
<b>Comment Period:</b>		<b>Important Information Links</b>
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<b>Section I: General Overview and Next Steps</b>		
<p>ICANN has conducted six case studies of individual scripts to investigate any issues that need to be resolved to facilitate a good user experience for IDN variant TLDs. This report provides a summary and analysis of comments submitted for the Cyrillic Case Study Report. ICANN will complete an integrated report that will summarize and synthesize the issues identified by the case study teams. It is expected that the results of the case studies will play a crucial role in the identification of solutions towards the delegation of IDN variant TLDs.</p>		
<b>Section II: Contributors</b>		
<p><i>At the time this report was prepared, a total of three community submissions were received. 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. Links are also provided to the comments received.</i></p>		
<u>Organizations and Groups:</u>		
<b>Name</b>	<b>Submitted by</b>	<b>Initials</b>
At-Large Advisory Committee	Matt Ashtiani on behalf of ALAC	ALAC
Link: <a href="http://forum.icann.org/lists/idn-vip-cyrillic/msg00002.html">http://forum.icann.org/lists/idn-vip-cyrillic/msg00002.html</a>		
<u>Individuals:</u>		
<b>Name</b>	<b>Affiliation (if provided)</b>	<b>Initials</b>
John C Klensin	Individual	JCK
Link: <a href="http://forum.icann.org/lists/idn-vip-cyrillic/msg00001.html">http://forum.icann.org/lists/idn-vip-cyrillic/msg00001.html</a> and <a href="http://forum.icann.org/lists/idn-vip-latin/msg00000.html">http://forum.icann.org/lists/idn-vip-latin/msg00000.html</a>		
Petko Kolev	Individual	PK

Link: <http://forum.icann.org/lists/idn-vip-cyrillic/msg00000.html>

### 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).*

The comments received were generally supportive of the Cyrillic case study report and findings. One comment suggested a specific addition include several Macedonian characters in the Cyrillic case study report. The At Large Advisory Committee comment was general to all six case study teams and noted a possible disparity between policy and technical implications of implementation of IDN variants. ALAC advised the case study teams to identify readiness of implementation, including the level of consensus in the language community, the impact across languages, and to avoid disadvantaging language communities that have implementable policies available. John Klensin provided two detailed sets of comments – one specific to the Cyrillic case study report with suggested modifications and requested clarifications, and one comment across all six case study reports.

### 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.*

Petko Kolev noted that the case study team did a great job with the report but suggested that a new Section 3.10 be added to include the following Macedonian characters:

- r (CYRILLIC SMALL LETTER GHE' (U+0433)) and ř (CYRILLIC SMALL LETTER GJE' (U+0453))
- κ (CYRILLIC SMALL LETTER KA' (U+043A)) and ř (CYRILLIC SMALL LETTER KJE' (U+045C))
- ı (CYRILLIC SMALL LETTER TSE' (U+0446)) and ı (CYRILLIC SMALL LETTER DZHE' (U+045F))

The team thanks Mr. Kolev for this precise and valuable comment, and notes that the input will be incorporated into the Cyrillic report.

The At Large Advisory Committee provided a general comment applicable to all six case study reports. The Cyrillic case study team notes that the ALAC comment has important and valuable comments for the variant project reports:

“1. While observing a diverse set of issues and unique circumstances for the different languages and scripts considered: ... The ALAC therefore would advise the VIP case study teams to identify and report on the types of issues that should be handled as IDN variant issues versus those that should be handled by other user confusion avoidance mechanisms applicable overall to non-IDN as well as IDN TLDs. Such distinction and explanation would provide important and useful context for the general community to provide comments to the work of the VIP case study teams.

2. The ALAC also observe the possible disparity between the policy and technical implications of implementation. We therefore advise the VIP case study teams to also identify the readiness of implementation, including the level of consensus within the language community, the impact across languages, and most importantly to avoid disadvantaging language communities that have implementable policies available.”

The Cyrillic team thanks John Klensin for the comments on the Cyrillic report as well as the valuable input for all of the teams. The nature of issues John has raised is truly deep and, in our opinion, might be addressed in ICANN future policy development efforts. In our Analysis Section below are short clarifications to John’s comments intended to acknowledge his insightful input and pass this work for future considerations. Once again, John Klensin – thanks a lot.

John Klensin’s comments are provided in-full with the Cyrillic case study team’s clarification comments in italics:

1 The team that produced this report is to be commended for keeping focus on the DNS and TLD issues and producing a report that is both useful and succinct. I believe that the fundamental recommendations and projected strategy are sound. Nonetheless, there are several issues with the report that may be worthy of note.

(1) The most important of those issues is that the report repeatedly calls for further study or further evaluation of various topics. While that is reasonable from some standpoints, in others part of the reason is that neither the Team nor, I assume, any sources they could readily identify. ICANN should elicit specific suggestions from the team about how such studies could be accomplished. See also the comments about “further study” in my “Overview” review (posted to the Latin script team forum).

A key aspect of those “additional study” topics for Cyrillic this report and apparently the expertise that went into it seem to cover the use of Cyrillic by Slavic languages fairly well but to become weaker (less deep or less confident) when other languages are considered. Saying that there could be new issues in languages, possibly identified in the report but not

represented on the committee is equivalent to saying that moving forward with Cyrillic policies and registrations would be entering unknown territory. That is, itself, a sort of meta-issue but, unless the Team has a proposal about how to resolve it, the list of issues is inherently incomplete.

*While all of what is above true, the Cyrillic languages are vast and constantly evolving, and by future study or further evaluation of various topics team means that the scope of this work in total is much larger than any team or experts capacity. The specific suggestions from the team about how such studies could be accomplished by ICANN was not intended under the scope of this work. (Cyrillic team)*

Another example of almost the same issue is the disclaimer at the end of Section 1. Apparently, the group believes, or may believe, that there may be a significant number of issues that have not been identified. Presumably some fraction of those hypothetical issues might change the results and conclusions of the report if only they were well-understood. How does the Team recommend getting this situation to the point that the risks associated with unexamined characters are acceptably low? Until that point is reached, does the team believe that its final report should become part of the consolidated report?

*While all above are absolutely legitimate questions, the team believes that the disclaimer at the end of Section 1 that no one could claim that it has complete ownership on all issues and that all issues that have been identified (and all other possibilities non-exist) is only natural. There is a clear statement of the principle that in case new Cyrillic languages are introduced, a conservative approach should be the case. It is stated by the team that all languages co-exist in DNS and the introduction of new Cyrillic languages should not affect the work. That was and is the case in a current DNS architecture. Moreover, the comments concerning this subject in John's Klensin "Overview" for Latin Team review are raising even bigger considerations. (Cyrillic team)*

1) This review was prepared at the request of the ICANN Variant Information Project Team and partially supported by ICANN. It reflects the author's personal views and may not reflect the views of ICANN staff, the members of the VIP teams, or other personnel associated with ICANN. The author had the opportunity to do partial reviews of working drafts of this documents and prepared comments for the team. Some of those comments are reflected in the report as posted and hence do not appear here. Sections of it draw heavily on other work by the author that bears on the issues discussed.

2) The "native speakers" count in footnote 1 may be misleading. If one is going to discuss the users of a particular script with a particular language, isn't some knowledge of literacy rates necessary?

*Good point, "native speakers" could be clarified to "reasonably literate native speakers" and might be incorporated in the Report. (Cyrillic team)*

(3) Cyrillic is one of the scripts that is dependent on Common or Inherited Script characters to form a significant number of strings. See the comments on this subject in my “Overview” review.

Quoting from “Overview”:

“Even after these reports, there is no agreement about what the term “variant” means. The usage in the original JET document that defined the term (RFC 3743) is reflected only in the report on the Chinese script. The hope that this project will clarify the usage of that term within ICANN remains in the category of future work and consensus. If that consensus cannot be achieved, I believe that ICANN should prohibit the use of the term as hopelessly confused and confusing unless it is carefully qualified in each instance of us.”

*While all above is true, the Integrated team is working now on consensus on the clarified meaning of the term “variant” for non-Chinese scripts. (Cyrillic team)*

(4) Several comments, e.g., those in Section 3.8, suggest that Unicode may add more precomposed characters where none now exist. Unicode is now discouraging adding new precomposed characters. More important, an important consequence of normalization stability rules is that, should such characters be added later, they will have no consequences for IDNA. Given that situation, it is not clear what this paragraph (and similar ones) mean.

*While all of what (4) says is true:*

*JCK's point is that Unicode tries not to add precomposed characters any more, so everything should be decomposed as it is now.*

*- NFC is supposed to guarantee that even if they \_did\_ add new precomposed characters when those get added the NFC rules for them would always turn them into the decomposed version anyway (and therefore there's not an issue)*

*It's still not known what would happen if any of those assumptions failed. (Cyrillic team)*

(5) The first paragraph of Section 6.3 requires that “all user experience implications arising out of variant Cyrillic characters...” as a gating condition for delegation of reserved names. The nature of variants as discussed in that document and of the range of possible user experiences substantially guarantees that meeting this condition requires proving a universal negative. What does the team believe is the actual gating condition? In addition, at least in principle, any plan based on allocation of multiple names in the root to the same party could be broken by a legal attack on ICANN that resulted in separating the names and requiring that they be delegated separately. How do this team, and others, believe that would affect their variant model? Or is the intent simply to try to encourage courts to not do that.

*While all of what (5) says is true:*

*Teams purpose of the work was to identify the issues, not come up with solutions. (Cyrillic team)*

(6) The report contains a certain amount of hand waving in the form of recommendations that probably cannot be implemented. The discussion immediately above also illustrates an example of this problem. As a better example, Section 7 recommends that “ICANN... only Cyrillic characters that have been vetted by the respective language communities.” Noting that one of the things that occurred when IDN delegations were first permitted for second-level names in existing TLDs was that registries received requests for strings identified with languages the registries had never heard of and also that the Cyrillic team was unable to recruit experts for non-Slavic languages that use the script, how does the team recommend that ICANN obtain and evaluate an appropriate and adequate vetting process?

*Thanks for raising this issue*

*The actual statement is:*

*"The case study team believes that ICANN should take a conservative approach in evaluating TLD applications that contain Cyrillic characters in the TLD label. The team recommends that ICANN take an inclusion-only approach and only accept Cyrillic characters that have been vetted by the respective language communities."*

*- That means ICANN only possibility to discuss an acceptance of new Cyrillic characters (on TLD level) is most likely could be done by introduction/vetting this characters by the respective language communities who represented by competent language users and be evaluated by competent language experts. This way ICANN could obtain and evaluate an appropriate and adequate vetting process. (Cyrillic team)*

(7) A variant strategy depends on blocking of names requires processes to identify the names that are to be blocked, databases to identify those names, and a regime for a registry to reject names requested by a registrar that are blocked rather than already delegated. It raises issues as to whether the blocked variants should be reflected in registry information databases and queries (“whois”). Yet Section 8 says that the team does not envisage any impact on registry/registrar operations. The team should explain that apparent contradiction.

*-While all of what (7) says is true for 2nd level domains, which is not under the scope of this work.*

*Section 8 says that the team does not envisage any impact on registry/registrar operations since as it's suggested here to blocking\reservation as a possible way of dealing with variants in Cyrillic. (Cyrillic team)*

