

## Asia Pacific Top Level Domain Association

31st August, 2009

Mr. Peter Dengate Thrush Chairman of the Board Internet Corporation for Assigned Names and Numbers 4676 Admiralty Way, Suite 330 Marina del Rey, CA 90292-6601 United States of America

Dear Mr. Thrush,

## **IDN ccTLD Fast Track Process**

I refer to the above matter.

We would like to express our thanks to ICANN for working on the Fast Track Process and also for participating in our recent members' meeting held in Beijing, China. Our thanks in particular to Theresa Swinehart, Tina Dam and Save Vocea for helping our members to better understand the issues as well as the current status of the Fast Track Process.

As you are aware, the IDN issue is something that is very important to the communities in the Asia Pacific region. Many AP ccTLD managers have participated, either directly or through APTLD, in ICANN's Fast Track Process with the expectation that they will be able to roll out IDNs at their respective top levels by mid-2009. There have been delays and our communities have been patient.

The expectation of our communities is that the Fast Track Implementation Plan will be finalised soon and approved by the ICANN Board at the Seoul ICANN meeting. Since the Fast Track Process is intended to address urgent need, any further delay would make a mockery of the term "fast track" as well as convince the ccTLD managers in the region that ICANN has no interest in connecting the disempowered.

On behalf of the ccTLD managers in the AP region, I request that the IDN ccTLD Fast Track Implementation Plan be finalised and approved with no more delay.

In finalising the Implementation Plan, ICANN must take into consideration that many of the ccTLD managers in the AP region are small and operate as non-profit entities. Their goal in securing an IDN ccTLD would be to serve their communities and as such the proposed processing fee of USD26,000 and annual fee would be an unreasonable burden on them.

ICANN must also recognise that many of the AP ccTLD managers have been administering their domains successfully for a long time without a formal agreement with ICANN or IANA. Similarly, registries of IDN ccTLDs should not be required to sign a formal agreement (DoR) before they can operationalise their IDN ccTLDs. The approach of ICANN encouraging the ccTLD manager to enter into a DoR or other form of agreement on a voluntary basis is acceptable to the ccTLDs in the AP region.

Also, variant strings must be delegated to the same IDN ccTLD Manager who, for practical reasons, should have the prerogative to deploy both the normal and variant strings to meet the needs of the local community. There are genuine needs for certain countries and territories to deploy both the normal string and variant strings as their IDN ccTLDs. The respective IDN registry therefore must be allowed to offer the active strings to end-users when they apply for an IDN domain. Any possible



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issues at the second and third levels caused by use of variant strings at the top level should be left to the registries to resolve either technically or by adopting appropriate policies.

I look forward to a fruitful resolution of the issues raised above and reiterate our request that the IDN ccTLD Fast Track Implementation Plan be finalised and approved with no more delay.

Yours faithfully,

Jonathan Shea

Chair

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cc Rod Beckstrom, President and CEO, ICANN
Theresa Swinehart. Vice President, Global and Strategic Partnerships, ICANN
Tina Dam, Senior Director IDNs, ICANN
Save Vocea, Manager, Regional Relations - Australasia/Pacific Islands ICANN