

To: Mr. Akram Atallah, Interim Chief Executive Officer, ICANN

Re: Important issues related to the new gTLD program

Dear Mr. Akram Atallah,

I found myself personally obligated to write to you and make you aware of some very important issues regarding the new gTLD programs that will have unconstructive impact on our societies. I would not carry out such an obligation if I have felt that ICANN outreach activities for the new gTLD program are successful and effective in our region (see 1 below). I am writing so that ICANN can be aware of and care for my community's rights and interests, as I expect that few participation from my country mate, language community as well as the larger Islamic community.

I am writing to you in my personal capacity utilizing my professional extensive experience in this field. I am an associate professor with more than 25 years of experiences in the field of IT, Internet, and domain name systems. I have fully managed and operated a ccTLD since 1995. I chaired a number of committees related to IDN and linguistic tasks, such as the chairman of the steering committee of the Arab Domain Name Pilot Project ([www.arabic-domains.org](http://www.arabic-domains.org)), the chairman of the linguistic committee as part of AINC (Arab Internet Naming Consortium). In addition, I am the principle author of the internet document RFC 5564: "Linguistic Guidelines for the Use of the Arabic Language in Internet Domains", and a number of scientific papers in the field of Arabic IDN. For more information, see:

[http://icannwiki.com/index.php/Abdulaziz\\_Al-Zoman](http://icannwiki.com/index.php/Abdulaziz_Al-Zoman).

This personal background is presented to provide you with the total confidence that the comments that you about to read are based on years of solid understanding and experiences.

### **1. Outreach and Language Barrier**

Largely, the new gTLD process (including announcements, website pages, consultations, documentations, forms, communications, people who are involved, objection process, ...) is done in English. Even if a translation is provided to some documents they are done very late and to very limited documents. Many sessions are running without translations. Thus, Non-English speaking communities, such as our Arabic community, would be left behind because of the language barrier. Many of my country colleagues are not aware of the program. So, they cannot participate in its process, and hence, their rights and interests are not protected. One indication for ICANN to verify (with respect to the participation from the Arab world, for example) can be the percentage of participation from the Arab world in the "New gTLD Application Comments Forum" to the total participation. I will expect this percentage to be very low compared to the participation from USA and Europe.

ICANN, as an international body, should have treated most world languages equally. All languages must be addressed and supported equally regardless of the location of the headquarter of ICANN. The current technical limitation of the DNS system, i.e. ASCII based system, should not deter the support of the “other” languages on an equal foot with respect to the process.

Personally, I tried to invite many people and organizations to participate in the process as some of the applied-for gTLD strings might be related to their communities. I found that most of them are not aware of the program not to mention ICANN.

## **2. Culture Diversity and Culture Domination**

ICANN is dealing and playing a very strong role in worldwide public policies. It sets global public Internet-related policies that effect many worldwide societies and communities with verity of values and cultures. Therefore, ICANN MUST adhere and respect these cultures and values and not to impose its own “western” culture and values to other communities.

Due to the new gTLD program and its applications, ICANN, as a USA-based private sector, looks as if it thinks that what is permitted in USA is also permitted or must be permitted in the rest of the world. It enforces western culture and values into other societies. It ignores and does not recognize other society’s values.

If the new gTLD programs had been limited to the United States, the homeland of ICANN, then it might be accepted to have some of the applied-for gTLDs strings (e.g., .sex, .sexy, .porn, .adult, or .gay). However, even if these strings (e.g., .sex, .sexy, .porn, .adult, and .gay) represent a permitted western standard of expressions, ICANN should not impose them globally upon the rest of the world. ICANN should not ignore the fact that some of the activities related to these strings are considered criminal act or unlawful in some parts of the world. Furthermore, ICANN should stick to GAC principles which call for respecting the sensitivity regarding terms with national, cultural, geographic and religious significance.

Some of the applied-for gTLD strings (e.g. sex, sexy, adult, porn, gay, ...) are not welcomed in many societies and communities and are against the law. ICANN should work for the benefit of societies. It should not indulge itself in prompting and expanding pornography on the Internet. ICANN is hurting families, children, women, and girls around the world by spreading and increasing porn in the Internet through allowing porn TLDs (e.g., .xxx, .sex, .porn, .gay, .adult, ...).

## **3. Handicapped Multi-stakeholder model**

Governments and intergovernmental organizations around the world are not adequately presented in the process. GAC is not comprehensive and their role is limited to advisory only, and this might be one of the reasons that many governments are not part of GAC.

The new gTLD program does not yet respond to all the concerns that governments have. The new gTLDs (generic TLDs) are not ONLY for generic names but also, unfortunately, include names that are very sensitive and of some concerns to governments (e.g., geographic, community, language, country, religion, ...), and hence the involvements of world-wide governments are crucial.

Stability and security of local communities that are living in harmony are among the main tasks of governments. Some communities (or countries) consist of multiple ethnic groups with different races, religions, sectors, languages, etc, that are living somehow in harmony and peace just because of the enforcement of some local laws and public policies that were developed by the communities/countries themselves.

Now, ICANN, with the new gTLD program, is involving itself in an area that is beyond its mandate. By allowing itself to set some public policies to harmonize the whole (internet), ICANN is intervening indirectly in world cultural issues and worse, is breaching local community harmonies. If the local community/country cultural concerns are not treated sensitively, the assignment for a new gTLD may ignite a civil war in that local community as an example. Protection of local communities cannot depend on objection mechanism or comment forum to avoid such a catastrophe.

The new gTLD program has a very serious deficiency with respect to the protection of values that are safeguarded by communities, countries, nations, and governments since ancient times. Examples of some of these values are: Geographic names (countries, cities, provinces, ..., ), Religion values (holy names, scripts, location, sectors, scholars, ...), Morality and public order, and Social security (ethical differences...).

Additionally, the objection procedure of the new gTLD program is complex, costly, and ONLY in English. The objection process shifts the responsibilities from ICANN to the communities, when it is ICANN's duty to make sure not to hurt communities by introducing a new gTLD in the domain name space that would cause havoc.

This proposed model: "if you do not like it then file an objection" cannot be used to deal with many morality and public order issues across the board. The process would put some communities on risk. ICANN should adhere to GAC principles in general and in particular the following:

- New gTLDs should respect the sensitivity regarding terms with national, cultural, geographic and religious significance.
- ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with the relevant governments or public authorities.

Hence, ICANN needs to consult directly with the governments (not only via GAC) and intergovernmental organizations (e.g., The Organization of Islamic Cooperation, OIC) about the new applied-for gTLD strings and it should admire and abide by their responses.

#### 4. Respect Language communities

Some applied-for gTLD strings are in Arabic language (i.e, IDN). The community should have been consulted particularly if the string is somehow awkward. For example, the applied-for IDN gTLD string (كوم), besides it is going to cause a very serious users confusion and security, it has no meaning in the Arabic language but rather it is the transcription form of the existing gTLD (.com). There is no word in the Arabic language called (كوم).

For this reason, ICANN must not get itself involved in the business of forcing a new Arabic word to the Arabic-speaking community without the backing of the authoritative Arabic language organizations from the Arab world. The applicant has no right to introduce a new word in the Arabic language without taking the approval from the Arabic Language Academy.

Additionally, the applied-for IDN gTLD string (كوم) is confusingly similar to an existing TLD (i.e., .com). They (the applied-for and the existing gTLDs) are having similar phonetic sound. This will lead to a serious usability problem that will result in user's confusability and domain name phishing activities.

Hearing a website address (through for example a phone, radio, etc) that ends with the phonetic sound ('ka:m) by an Arabic-speaking user will cause him/her to bewilder about the correct website whether it's under the Latin TLD (.com) or the Arabic IDN TLD (كوم). Thus, it may direct the user to the wrong website.

To illustrate this problem consider the following example. An Arabic-speaking user hears a web site address from a local radio station and it sounds like (ja:'hu: (dot) 'ka:m). He/she will not be able to figure out whether the domain name is :

yahoo.com

Or

ياهو.كوم

Additionally, cyber-squatters will find the applied-for IDN gTLD string (كوم) a very good playground field for their unlawful activities. Many existing registered domain names under ".com" as well as new ones will be vulnerable for phishing activities.

To illustrate this security problem, cyber-squatters will be able to register domain names like the following:

ياهو.كوم to resemble yahoo.com

توقل.كوم to resemble google.com  
فيسبوك.كوم to resemble facebook.com  
ساب.كوم to resemble sabb.com (a well know Bank in Saudi Arabia)  
سامبا.كوم to resemble samba.com (a well know Bank in Saudi Arabia)  
ارامكو.كوم to resemble aramco.com (a well know Oil company)  
... etc

Yet another major problem that the applied-for IDN gTLD string (كوم) is going to impose to our community some strange linguistic behavior so that we will end-up with many English domain names that are written in Arabic characters, i.e., they will be many transcription domain names rather than full and true IDN.IDN. This new dangerous move has implicit rule about the future of Arabic is that anything that can be "borrowed from the American", starting with "'ka:m" is a proper resource name in Arabic. For examples,

رنت-كار.كوم  
فاستفود.كوم  
كول-مي.كوم  
ريال-ستات.كوم

Hence, introducing new IDN gTLD strings should have a strong backing from the language community and it should not be driven by ONLY profit and increasing business share. Consequently, to protect Arabic-Speaking businesses and users in the cyberspace, the applied-for IDN gTLD string (كوم) should not be granted.

Finally, I hope you will consider these issues before the approval of the applied-for gTLD strings, and I hope the outcome of the new gTLD process is not indication and a proof that a private-led ICANN:

- is not good for public policy.
- does not care and work for the public interests.
- works against the protection of children and family.
- does not work for the protection of languages and communities in the Internet.
- works for the benefit and increase revenue of some limited private sectors.

Sincerely yours,  
Abdulaziz Al-Zoman