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**Sent:** 5/19/2013 2:50 PM  
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**Subject:** IDN 2LD migration from legacy gTLD to IDN newGTLD

There are currently over 1 million IDN's registered in the .com gTLD, along with many IDN's registered in .net, .org, .info and .biz ("CNOIB").

These legacy domain registrations suffer from problems (eg. browser compatibility) caused by security concerns - most of them are mixed-script domains - the 2LD in a non latin script while the TLD itself is ASCII. An example would be Πορше.com - xn--e1arcf4b.com - registered to Porsche.

The GNSO IDN Working Group Outcomes Report (<http://gnso.icann.org/en/drafts/idn-wg-fr-22mar07.htm>) recognises these legacy domains, in paragraph 4.2.13, supporting potential specific provisions regarding applications for IDN top-level strings from legacy gTLDs.

The aforementioned report also supports in paragraph 4.1.9 the adherence of a single script across all levels in an IDN gTLD - this is a security and stability issue, and will make these IDN newGTLD's more secure and less liable to phishing, etc. Strangely, they do not include the same recommendation for the legacy CNOIB.

I propose that, in order to increase the security and stability of the DNS, ICANN adds specific provisions to the contracts for the transliterated CNOIB IDN newGTLD's (as allowed for by the Outcomes Report paragraph 4.2.13) that require the registry to migrate existing registrations in CNOIB to their appropriate IDN newGTLD (for example migrating the registration Πορше.com - xn--e1arcf4b.com to Πορше.ком - xn--e1arcf4b.xn--j1aef) and then redirecting traffic from Πορше.com to Πορше.ком until such time as the registrant requests the .com version to be cancelled and blocked. This would allow for the future return of .com to a purely latin TLD - no longer mixed script across the TLD/2LD - a vast improvement on the safety and security of the DNS.

Regards,