Proposed Service

Name of Proposed Service:

Blocking IDN Variants in .MOE

Technical description of Proposed Service:

Blocking of IDN variants. Variant IDNs (as defined in the Registry Operator’s IDN tables and IDN Registration Rules) will be blocked from registration.

Registrations, in their ASCII (A-Label) format, will be pushed to the zone file in the same manner as any other domain registration. If an IDN registration includes variants, the variants will be blocked.

Please see the attached Japanese-IDN Table.

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

No particular consultation has been done with the community. The blocking of IDN variants is a standard, and necessary service that will benefit Internet users by mitigating string confusion.

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

N/A. Not a sponsored TLD.

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?: 
c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

Timeline

Please describe the timeline for implementation of the proposed new registry service:

The service is already set up and ready for implementation, and therefore, the Registry would like to implement this service after immediately upon approval, or at the latest after the 60-Day Sunrise period of the TLD.

Business Description

Describe how the Proposed Service will be offered:

Registrations, in their ASCII (A-Label) format, will be pushed to the zone file in the same manner as any other domain registration. If an IDN registration includes variants, the variants will be blocked.

Describe quality assurance plan or testing of Proposed Service:
The service is standard and is already in operation for Japanese IDNs in the .BIZ top-level domain.

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.

**Contractual Provisions**

List the relevant contractual provisions impacted by the Proposed Service:

Appendix A section 4 (Internationalized Domain Names (IDNs) of the Registry Agreement would be changed to reflect the Registry Operators rights to offer this service.

Currently 4.2 is written as follows:

4.2. Registry Operator will not offer variant IDNs.

The provision would be changed as follows:

Variant IDNs (as defined in the Registry Operator's IDN tables and IDN Registration Rules) will be blocked from registration.

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

We do not foresee any issues/changes regarding data reporting to ICANN.

What effect, if any, will the Proposed Service have on the Whois?:

The service will not impact Whois.
Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

4.2 of Appendix A is requested to be changed as follows:

4.2 Variant IDNs (as defined in the Registry Operator's IDN tables and IDN Registration Rules) will be blocked from registration.

Benefits of Service

Describe the benefits of the Proposed Service:

Interlink Co Ltd's Japanese IDN implementation has a feature that mitigates homographic attacks due to Han variants by blocking a name from being registered if a similar name is already registered. The mechanism by which this works is that every registered domain name has a computed canonical string associated with it. This canonical string is only used internally to block similar names from being registered.

Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain:

We do not see any impact on competition with the implementation of this service.

How would you define the markets in which your proposed Registry Service would compete?

The TLD aims to compete in the Japanese market. Currently, IDN variants are blocked under .jp as well as in IDN strings under .com/net and .biz. The implementation would help the registry maintain consistency with other existing TLDs.
What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

`.biz` (Neustar) `.jp` (JPRS) `.com/.net` (Verisign) all offer blocking of IDN variants.

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

_The introduction of this service would not impair competition._

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide?:

_Our current Registry Backend Systems Provider, Neustar will handle the implementation of this service. The service will be implemented in the same way it has been under .biz for years._

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications?:

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).?:

**Security and Stability**

Does the proposed service alter the storage and input of Registry Data?:

No.

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

There are no concerns regarding throughput, response time, consistency or coherence of response to Internet servers or end systems with the implementation of this service.

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

No.

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

no.

List Disclaimers provided to potential customers regarding the Proposed Service:

Many languages may have character variants that could may cause user confusion. The IDN community has worked hard to provide a solution to these potential issues. Interlink will implement IDN variant blocking as a method to help reduce user confusion.

Any other relevant information to include with this request:
Please note that Interlink Co., Ltd's New gTLD application for the .moe top-level domain reflects its desire to provide this service. Interlink had planned on operating this service from launch day, however, due to an oversight in our Registry Agreement we have been required to apply through this channel for approval to operate the TLD with this service implemented.

We appreciate your willingness to expedite this registry service request.