

Report of Public Comments

Title:	IDN Variant TLD Program - Revised Program Plan														
Publication Date:	17 July 2012														
Prepared By:															
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Staff Contact:	Kurt Pritz	Email:	kurt.pritz@icann.org												
Section I: General Overview and Next Steps															
<p>The goal of the IDN Variant TLD Program is to define the necessary processes that must be in place to enable the management of variant TLDs. The recently completed IDN Variant Issues Project documented the issues associated with the potential inclusion of IDN variant TLDs in the DNS root zone with the publication of the final Integrated Issues Report on 20 February 2012. ICANN then created the Proposed Project Plan for Next Steps, posted it for public comment, and presented it in a session at the ICANN meeting in Costa Rica in March 2012. Based on the input received, the project plan was revised, renamed the IDN Variant TLD Program, and posted for another round of public comment. The revised plan was presented in a session at the ICANN meeting in Prague in June 2012.</p> <p>We plan to publish an updated version of the IDN Variant TLDs Program incorporating input received during the second round of comments.</p>															
Section II: Contributors															
<p><i>At the time this report was prepared, a total of [number] (n) community submissions had been posted to the Forum. 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.</i></p>															
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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).

GENERAL COMMENTS

Timely Implementation. RySG believes from both business and policy aspects that a timely implementation plan for variant TLDs as well as a Board decision about actual IDN variant delegation are critically important to the success of the new gTLD program. The Revised Program Plan appropriately includes some community feedback and concerns (e.g., the discussion during the VIP session in Costa Rica)--in particular, the prioritization of Project 2.1 regarding implementation of variant code point repertoire, and shortening the overall program timeline. RySG welcomes such revisions and encourages the project team to stick to the revised timeline. *RySG (25 May 2012)*

Allowing Differentiated Timelines Depending on Community Readiness. RySG urges the project team to work closely with the technical and language communities to determine the parameters of the readiness of IDN variant delegation, and to allow some languages, if not all 6 languages, to implement IDN variants if such languages have no operational concern on the "readiness" issue. *RySG (25 May 2012)*

The revised IDN Variant TLD Program Plan did not adopt CDNC's suggestion that ICANN establish an IDN variants implementation process framework to allow language/script communities to proceed through it separately according to different timelines. In response to ICANN's reply to CDNC's suggestion, CDNC wants to clarify that its suggestion is not in fundamental conflict with ICANN's goal of coordinating different languages/scripts in the root zone. It can help ICANN to accommodate the needs of users of multiple global scripts. *CDNC (25 May 2012)*

- Accommodating various needs in the root zone does not necessarily require a parallel timeline for different languages and scripts. Differentiated timelines for each script can also achieve this goal through incremental modification and update of the implementation process in

accordance with the emergence of new concerns. In contrast, overemphasis on a unified timeline neglecting the varied development status on variants issues of each language/script community could be more unsatisfactory because it would lack real-world implementation testing and have an incongruity with some implementing IDN variant solutions used by different languages/scripts communities. The unified timeline also conflicts with the bottom-up principle for policy making. *CDNC (25 May 2012)*

- Different languages/scripts communities have varied concerns regarding implementation of IDN Variants TLDs in the root zone, so the accommodation of different languages/scripts on IDN variants needs is expected to be a lasting process. A precipitate unified implementation process with a parallel timeframe might be difficult to achieve consensus on among different communities, so that the delegation process of IDN TLDs might be delayed significantly. In contrast, by adopting the current implementing IDN variants solutions, the uncertainty can be reduced to a predictable level (e.g., prioritized implementation of mature and widely accepted standards (e.g., RFC 3743) can serve as a reference for further implementation of IDN Variant TLDs in the root zone; hands-on experience can facilitate development of solutions in other languages/scripts communities). The VIP team must update the process as new languages/scripts get in the root zone. Best practices can be forwarded to less developed communities. *CDNC (25 May 2012)*
- With a lot more variant TLDs using different languages and scripts, such as Thai and Hebrew, to be delegated in the near future, even if the implementation process study coordinates variants issues for the 6 languages for this time, the final outcome might still be challenged by newly involved languages. Updates and refinements of the standards and implementation process for IDN Variant TLDs in the root zone might still be required anyway. Only by establishing an open process and standards, updated from time to time, can the coordination of different languages and scripts be achieved to the maximum extent. *CDNC (25 May 2012)*
- In conclusion, the VIP team should prioritize the study of implementation of widely accepted and utilized IDN variants solutions in the root zone and allow IDN TLDs adopting such solutions to be delegated according to differentiated timelines in accordance with their respective development level. The implementation process should be open to updates for accommodating other latent variants in order to establish a best practice for implementing variant TLDs in the root zone. Differentiated timelines would not only help to reduce the time and cost disadvantages caused by the parallel study of IDN variant TLDs of different languages/scripts, but also would accelerate the overall delegation process of IDN TLDs. *CDNC (25 May 2012)*

Concerns About Differentiated Timelines Discussion. The plan makes a distinction, correctly in Dyn's view, between processes and implementation of processes. There is no way to move ahead at different speeds until there is agreement both on how one would determine what code points are to be permitted, and how one could determine variants of code points. Those are procedural matters that pertain to the whole of Unicode (including versions of Unicode not yet published) and to the root zone as a whole. Such procedures cannot be developed differently for different language communities, no matter how well those communities' techniques work in other parts of the DNS hierarchy. *Dyn (14 June 2012)*

- People may be confused on this matter because of the Project's unfortunate reversion to the term "tables". The Integrated Issues Report distinguished between the code point repertoire for a zone, and the code point variant rules (i.e. the rules over the repertoire). Because these are separable (although linked) problems, it makes sense to try to retain the distinction and to use the terminology the Integrated Issues Report offered to keep the distinctions in mind. Reversion to the "tables" terminology risks causing people to start to conflate these different problems, as well as the problem of other tables in subordinate zones. That might be what is happening in the comments. There are indeed tables that are already in use for other zones in the DNS, but the management of these processes for the root zone is a matter entirely unlike that of a zone with a more constrained user base. *Dyn (14 June 2012)*
- The project plan correctly recognizes that any further action is completely dependent on developing the necessary processes, and it would be a grave error to attempt to proceed otherwise. *Dyn (14 June 2012)*

Flawed assumptions and approach to IDN Variant TLD Program. There are four fundamental problems with the proposed program plan (these have been raised in earlier comments but do not appear to be reflected in later documents and proposals so are summarized again for the record). *J. Klensin (16 June 2012)*

- (1) A rational reading of earlier reports and comments is that we still do not really know what "variants" are, especially in a language-independent way. Most of the notions of variant TLDs are incompatible with the actual workings of the DNS, and probably the various ideas associated with the term "variant" are better supported by a single canonical form in the DNS and user interface localization work as needed. Put differently, the strongest arguments for variants are basically localization issues and the DNS is very poorly suited for direct support of localization. The plan is not written to encourage ongoing evaluation of the issues and tradeoffs with a significant possibility of concluding that variants should not go forward. The plan assumes that they not only will go forward but that it is useful to create a rather complex structure to attempt to regularize them and encourage their use. *J. Klensin (16 June 2012)*
- (2) Pushing off topics such as whole-string variants and visual similarity studies into other areas makes superficial sense but these topics do not go away. Some of the issues with whole-string variants will reemerge as issues about trademark conflicts and requirements to defend them. The effect of pulling topics like this into separate projects and deferring others into FY2014 or later is that it becomes that much more difficult for the Board and other decision makers to get a picture of a complex issue with many parts and interrelationships that is complete enough to make a good evaluation of the tradeoffs and risks. *J. Klensin (16 June 2012)*
- (3) The plan ignores important interactions such as those between having associated names and the organization and content of registrant databases. *J. Klensin (16 June 2012)*
- (4) A less expensive, faster and probably more effective approach has been proposed before and not considered. That alternative is to let people apply for labels they consider related at the same time, focus any special efforts on a streamlined objection procedure and blocking, and permit proactive notification of strings that would be considered in conflict. This recommendation is consistent with recommendations made by 2 committees reporting to the

Board at ICANN 17 in 2003. It is simple and straightforward in a context where complexity (as in the plan unfolding in the project plans) is the enemy of transparency and of Internet Stability and Security. *J. Klensin (16 June 2012)*

SPECIFIC COMMENTS

Project 1. IDN Tables Format.

CDNC accepts ICANN's plan for the standardized IDN Table Format in the root zone. A compatible IDN Table can lay a solid foundation for IDN domain name registration, resolution and further IDN variants issues. For the IDN Tables Format project, CDNC would be glad to contribute its experience of table creation and maintenance for the study. Based on CDNC's analysis of the RFC draft "Representing Registration Policy for IDNs Using XML", the result suggests that this proposed format can be transferable with the table format defined by RFC 3743. CDNC suggests that if variant gTLD applicants submit their table format in accordance with RFC 3743, they do not need to wait until final approval of this RFC draft for the final delegation, enabling the delegation process to be done in parallel with this project. CDNC will continuously support the IDN table format standardization. *CDNC (25 May 2012)*

Project 2.1. Developing the IDN Table Creation and Maintenance Process for the Root.

According to CDNC's experience, the Table Creation and Maintenance Process relies on the table format development. With its years of experience, CDNC has worked out scientific processes for supplement and removal of code points. CNNIC can provide its experience as a reference for Project 2.1. *CDNC (25 May 2012)*

Project 2.2. Implementation of the Root IDN Tables Processes.

CDNC believes that delegation of IDN TLD completely relies on the table format development; therefore, the ideal approach to decide whether the IDN TLD can be delegated is to examine the submitted IDN table. Therefore the development of Project 1 shall be emphasized and the later-on process might be shortened. *CDNC (25 May 2012)*

Project 6. Examining the User Experience Implications of Active Variant TLDs.

CDNC is willing to join force with the VIP team to research the user experience implications related to variants issues. CDNC would like to share with the ICANN community members CDNC's prolific user experience research results on Chinese Variant Domain Names usage in order to contribute further to this project. *CDNC (25 May 2012)*

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.

Timely Implementation

Comment noted regarding the perceived importance of the IDN variant TLD issues and the expected

timely solution. The goal of the IDN Variant TLD Program is to define the necessary processes that must be in place to enable the management of variant TLDs as promptly as possible.

Allowing Differentiated Timelines Depending on Community Readiness

Comments noted that it is important to note that various script communities may have differing degrees of study and experience with regard to variant code points. We agree, however before allowing some communities to move forward, as noted by Dyn's comments and in the Integrated Issues Report, the root zone is a shared resource, and the management of the root zone should accommodate, to the maximum extent possible, the needs of users of multiple global scripts. The Integrated Issues Report highlights the need to have a common framework (P2.1) to establish the rules in the root zone that would guide a later process (P2.2) that would be done by each community at its own pace and responding to their needs. Before proceeding to the individual community developments (P2.2), a set of issues and processes need to be defined, e.g., what is a community (language, script or something else based), the process to convene those communities, the process to update the community developed rules/tables at a later time.

Reversion to the Term "tables"

As suggested by Dyn we plan to revert to the use of the terminology used in the Integrated Issues Report, i.e., distinguishing between the code point repertoire for a zone, and the code point variant rules (i.e. the rules over the repertoire). It is agreed with Dyn that it makes sense to try to retain the distinction and to use the cleared terminology used in the Integrated Issues Report. We will make the change in the final version of the plan.

Flawed assumptions and approach to IDN Variant TLD Program

A comment highlighted correctly that we don't (yet) have conceptual definition of what a variant is. However, it should be noted that the Integrated Issues Report describes the types of variants that have been seen in use or that people have thought of. In that regard, the intention is to proceed forward with this operational definition of variant as a sufficient means for working with variants. It is also worth clarifying that variants can have different states as explained in the Integrated Issues Report, e.g., blocked, withheld, allocated, active, mirrored. The comment seemed to imply that all variants are mirrored variants, in the Report and the Program Plan there is the intention to clearly distinguish the states and types of variant so that a conclusion can be reached on each of them as appropriate.

The proposal to permit applications for labels the applicants consider related at the same time, and to focus any special efforts on a streamlined objection procedure and blocking, would appear to require exactly a similar amount of work to define the Label Generation Ruleset as already proposed (Projects P2.1 and P2.2) to determine the objection and blocking procedures.

Regarding whole-string variants, we plan to further clarify the status of this type of variants for (no) implementation in the root zone.

Specific comments on various projects

We appreciated CDNC support for IDN table format standardization. Regarding CDNC offer to help on

the various projects, we look forward to learn from their experience and work with them and any other interested community members. We also concur that we do not need to wait until final approval of this RFC for the final delegation, however it would be desirable.