Report of Public Comments

Guidelines for Developing Reference Label Generation Rulesets (LGRs) for the Second Level

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Section I: General Overview and Next Steps
To facilitate and improve consistency of testing and stability of registry operations of new gTLDs, ICANN is developing reference Internationalized Domain Name (IDN) tables in machine readable format, called Label Generation Rulesets (LGRs) for the second level, for use in Pre-Delegation Testing (PDT) and the Registry Service Evaluation Process (RSEP). Based on the process finalized after public comment, as the first step ICANN released a draft of the Guidelines for Developing Reference LGRs for the Second Level [PDF, 544 KB] for public comment.

Section II: Contributors
At the time this report was prepared, a total of five (5) 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.

Organizations and Groups:

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<tr>
<th>Name</th>
<th>Submitted by</th>
<th>Initials</th>
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<tr>
<td>Saudi Network Information Center (SaudiNIC)</td>
<td>Raed I. Al-Fayez</td>
<td>S-NIC</td>
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<td>JPRS</td>
<td>Hiro Hotta</td>
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<td>GNSO RySG</td>
<td>Stéphane Van Gelder</td>
<td>RySG</td>
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<td>Google Registries</td>
<td>Stephanie Duchesneau</td>
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<td>Verisign</td>
<td>Chuck Gomez</td>
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Individuals:

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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).
JPRS

Any additional rules needed by ICANN should be clearly described. The variants must be consistent for languages which share the same script. The LGRs should incorporate existing practices by the TLDs.

S-NIC

The document should clearly state that the guidelines are targeted for gTLDs and not ccTLDs. In addition, there code points included should be limited to LDH. Such work should start from root zone LGR and only add necessary code point needed, e.g. digits for Arabic script. Variants should be defined for language level and accumulated for script level. The Linguistic review should balance language needs and user acceptance and prevent any security risks. The review should be done by experts from language communities, registries, registrars and DNS security community. Registries should especially be involved in the DNS Security and Stability review.

RySG

The Process of LGRs at top level is underway. So second level LGRs should wait until top level work is completed so that it can be used as a reference, as this could result in inconsistencies.

RySG does not oppose process to develop reference LGRs provided they are treated as references, but will object to be treated as requirements. Two key questions need to be answered for the proposed Guidelines: (i) Do the Guidelines maximize the benefits to the registrants and users? (ii) Are the perceived benefits of the Guidelines sufficient to justify the implementation costs that registries and registrars will incur to implement them? An impact analysis of the Guidelines or any other proposed approach to LGRs should be carried out and reviewed by the community before they are finalized.

In case ICANN intends the resulting LGRs to become binding, RySG believes that the implementation of the Label Generation Rulesets as currently proposed could reduce competition among registries. Implementation of the proposed Guidelines will reduce competition by preventing registries from offering a variety of characters or rules. It’s important that registries minimize possible confusion regarding domain name registrations, but we believe that that can be done without being overly restrictive with LGRs. Historically, legacy gTLD and ccTLD operators have had very different policies on variants of the same script. The RySG supports continuation of this approach and believe that it has helped to create a vibrant domain name marketplace. We question whether ICANN or any other organization is capable of or even wants to become the authority which sets the de facto standards for all written language. Further, languages are not static. An entity tasked with documenting language rules in perpetuity would be inundated with questions and requests and may cause unnecessary delays. Finally RySG wants to emphasize that domains are not language. Domains are appropriately described as ‘names’. Names transcend language. Many such examples have been discussed. A good English language example is the FLICKR.COM domain, a popular image aggregation site. ICANN should focus on more worthy goals for the domain marketplace, such as ensuring security and stability, and fostering competition.

GR

Do not oppose any steps or processes proposed for the development of second level LGRs. But must not create expectation that registries will be required to implement the reference LGRs. The output should be limited to guidelines registries may rely upon in developing their own rulesets.
The guidelines propose repertoire between core and extended subset. A registry could go beyond such recommendations as long as it complies with RFCs and should not be prevented by ICANN in doing so, regardless of whether they accord with the reference LGRs during PDT, RSEP, compliance monitoring or any other process.

VS

Agree with RySG – timing, impact, goals of domain marketplace

LGR may change requiring registered domain names to be subject to deletion due to requirement not in place at registration time.

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.

Response to JPRS comments.

Using LGR specification for development of language tables allows for very clear definition of any rules required for a language. Thus such requirements will be formally documented in the LGRs being developed. The community can review and comment of any of these rules once LGRs are released for public comment. A language may not consider two code points variants of each other, where other language may do so within the same script. Examples of such cases exist in Han and Arabic scripts. Carrying variants of one language to another within a script may not be relevant in the context of a language – as its scope is different from a script level analysis. Wider feedback from script and relevant language communities could help in this process when specific LGRs are released for public comment. The current practices of TLDs will be taken into account in the development of the LGRs.

Response to S-NIC comments:

The comments have been noted. The reference tables are only applicable in the context of PDT and RSEP which are processes related to gTLDs. However, they will remain openly available for others to use, as needed. Currently only language level LGRs are being developed. The suggestion for script level variants is noted for consideration when script level LGRs are being developed. Security and stability of the DNS are of primary significance. Linguistic work will be done within this consideration. Once the LGRs are developed, they will be released for public comment for the community to review; not only the content but also the linguistic and technical review. All the stakeholders will be able to freely participate in the process and guide the development of these LGRs.

Response to RySG comments:

Top level LGR work will indeed be a relevant and useful influence on second level LGRs. However it is also important to note differences between the top-level LGR work and the current reference work at the second level. First, even the active communities are focused on script based analysis for the top-level, where the current reference tables are focused on languages, thus having a different focus and scope of work. Second, the top-level is inherently more conservative so decisions for exclusion of code points may not carry over to the second level. And finally, LGR at top-level is prescriptive whereas the second level reference LGRs are non-prescriptive,
allowing flexibility and with ability to absorb changing requirements of the community.

For the top-level LGRs, different communities have started at different times and are progressing at different speeds, with some communities not yet active. Thus, waiting for the top-level LGR process to complete may delay the current work significantly. Further, the membership of the Generation Panels may not have representation of all the languages for which the LGRs are being developed. In such cases, the relevant script Generation Panels (GPs) may not be able to provide detailed feedback on specific language based LGRs at the second level.

However, as noted, the top-level work can still usefully inform the second level work to some extent. To benefit from this opportunity but prevent the impact of the delay as it was suggested in earlier comment period on the overall process that the relevant community based Generation Panels will be explicitly contacted to respond to the relevant language tables being developed. Where the panels are not yet formed, they will be requested to review these tables once they are formed. Their feedback will be taken into account to finalize the language based LGRs being developed or update them later with such feedback, in cases where the Generation Panels are not formed at this time. This will help incorporate the feedback from GPs without delaying the work waiting for the GPs not yet active or not yet done.

The Reference Second Level LGRs are focused on bringing transparency in the PDT and RSEP processes. As they do not enforce any limits on the content of these LGRs, but only provide a reference point, the decision on the content of LGRs still rests with the registries. ICANN staff will look into the extent that the reference LGRs are different from those currently being used to determine the extent of impact on the registries.

As these reference LGRs are not binding as standards and registries can deviate from them based on justification, they would not negatively impact competition or the choice of domain labels available to the registrants. The justification mechanism is already in place in the PDT process. ICANN will also update these tables based on community feedback and through information provided by registries through the PDT and RSEP processes.

Response to GR comments:

ICANN thanks Google Registry for its support for the steps proposed.

The verification of IDN tables is already agreed by the community and is already in place during PDT and RSEP. However, at this time there is no reference to perform such checks. The Reference Second Level LGRs will provide criteria to check the submitted language or script tables during PDT and RSEP making the processes more straightforward for the community.

However, it is not the intention to limit the IDN tables to these LGRs. The process will significantly facilitate the registries which intend to take forward the typical set of language and script LGRs agreed by the community. But the registries may arbitrarily deviate from these reference LGRs. In such cases, the registries would need to provide justification for the deviation as part of the testing requirement.

The final LGR agreed at the time of PDT and RSEP (including any arbitrary extensions agreed at this time) will remain the reference for compliance monitoring or other relevant processes.

Response to VS comments:
For first set of comments, referring to the RySG comments, please see the response to RySG comments.

Further, Reference Second Level LGRs are only a reference for PDT and RSEP processes for the registries intending to support additional languages or scripts. They do not bear on existing operations including the languages tables which are already in use. Thus, LGR or its updates will not negatively impact such operations including already registered domain names. However, additional analysis will be done using existing tables to gauge any adverse impact. Next steps will be determined after the impact has been analyzed.