Label Generation Rules for the Root Zone Version 3 (RZ-LGR-3)

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Public Comment Proceeding

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Section I: General Overview and Next Steps

The Integration Panel (IP) has successfully evaluated the Root Zone Label Generation Rules (LGR) proposals for 10 additional scripts, including Devanagari, Gujarati, Gurmukhi, Hebrew, Kannada, Malayalam, Oriya, Sinhala, Tamil and Telugu. These proposals were finalized and submitted by the respective Generation Panels (GPs), following the release of the individual proposals for public comments. The IP has integrated these proposals, along with Arabic, Ethiopic, Georgian, Khmer, Lao and Thai scripts already integrated into the second version of the Root Zone LGR (RZ-LGR-2), to develop the third version of the Root Zone LGR (RZ-LGR-3). As per the Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels, the RZ-LGR-3 was released for public comments to gather community feedback for its finalization. RZ-LGR-3 will be finalized based on these public comments and will be used to determine valid top-level Internationalized Domain Name (IDN) labels and their variant labels.

Section II: Contributors

At the time this report was prepared, a total of five (5) community submissions had been posted on 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:

Name	Submitted by	Initials
Hebrew GP	Doron Shikmoni	DS

Individuals:

Name	Affiliation (if provided)	Initials
Akshat Joshi	NeoB-GP	AJ
Kuldeep Patnaik	NeoB-GP	KP
Uma Maheshwar G Rao	NeoB-GP	GR
Dr. G. S. Lehal	NeoB-GP	GL
Dr. Shanmugam Rajabadher	NeoB-GP	SR
Pavanaja	NeoB-GP	P
Natin Walia	NeoB-GP	NW

| Harsha Wijayawardhana | Sinhala GP | HW |
| Gangadha Panday | NeoB-GP | GP |

Section III: Summary of Comments

AJ-1 and NW-1: Comment on Devanagari LGR integration
These comments note that integration has been verified and no issues found.

AJ-2: Comment on Gujarati LGR integration
The comment notes that integration has been verified and no issues found.

DS-1: Comment on Hebrew LGR integration
The comment notes that integration has been verified and no issues found.

KP-1: Comment on Odia LGR integration
The comment notes that integration has been verified and no issues found.

GR-1, GR-2: Comment on Telugu LGR
The comment, together with an additional second comment to further clarify the original comment, notes that the Telugu LGR contains a rule prohibiting Halant from following a Nasal Consonant and that this rule can and should be deleted as this is a common feature in Neo-Brahmi scripts and the Telugu LGR the only one to restrict it. In particular, the rule would establish a difference between the closely related scripts of Kannada and Telugu.

GL-1: Comment on Gurmukhi LGR integration
The comment notes that integration has been verified and no issues found.

SR-1: Comment on Tamil LGR integration
The comment notes that integration has been verified and no issues found.

P-1: Comment on Kannada LGR integration
The comment notes that integration has been verified and no issues found.

HW-1: Comment on Sinhala LGR integration
The comment notes that integration has been verified and no issues found. The comment further notes that "the absence of Yansa and Rakar formats in root domains will limit innovation in Sinhala TLDs". But that this issue is not relevant to the current work.

GP: Comment on Telugu LGR in response to GR-1, GR-2
The comment notes that the GP had a healthy discussion of the comments and reconsidered the rule in question. The GP decided to remove the rule with the motivation of making the use of labels more clear and allowing labels to be formed from some common words.

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

The majority of comments confirm that the integration work of the GP conforms with the LGRs submitted. These are noted but require no further action.

For the remaining comments on Telugu (GR-1, GR-2 and GP1), the NeoB-GP reviewed the Telugu LGR and after a "healthy discussion" including representatives for the related script Kannada, came to the following consensus:

"Follow up on the previous comment to Telugu LGR in LGR-3, the NBGP had reconsidered the restriction of Halant following Nasal-C and decided to drop the rule to accommodate the general usage of labels in Telugu e.g. names.

Also the homophonic variant issue will be handled outside of the LGR, the same way as other Neo-Brahmi script proposals.

Example of Telugu labels which become valid in the updated Telugu LGR:

1. *చంపా champaa - flower name*

2. *గంప gampa - basket [made of bamboo]*

3. *తంటా tantaa - difficulty*

4. *పండు pandu - fruit*

The main motivation is to make general usage of labels more clear and remove ambiguity."

Note that this change now also resolves an earlier public comment raised by Liang Hai in the original commenting period on the Telugu LGR.

The GP has resubmitted a revised LGR proposal for Telugu dated June 7, 2019 and the IP has replaced the original March 6, 2019 proposal with it and redone the integration, after reviewing and approving of the updated LGR. The published RZ-LGR-3 will reflect this update.

The change treats this particular homophonic variation that is common to Neo-Brahmi scripts in a way that is consistent across scripts. (Like the homophonic variation "color" vs. "colour" in English, each element in the pair is treated as a separate label, based on the distinct spelling). The change increases the coverage for Telugu labels and also better satisfies the "Predictability Principle"; removing a rule also would have the tendency to decrease the complexity of the LGR. These were among the factors weighed by the IP in approving the updated LGR for integration into the RZ-LGR.