

# Study on Technical Use of Root Zone Label Generation Rules

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**Prepared By:** RZ-LGR Study Group

## Public Comment Proceeding

Open Date:	2 August 2018
Close Date:	11 September 2018
Staff Report Due Date:	25 September 2018

## Important Information Links

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## Section I: General Overview and Next Steps

Second version of the Root Zone Label Generation Rules (RZ-LGR-2) was released in August 2017, integrating six script proposals, as other LGR script proposals are being finalized. The Root Zone Label Generation Rules Study Group (RZ-LGR-SG) has been constituted to study and make recommendations for the technical use of RZ-LGR in a harmonized way across IDN TLDs. RZ-LGR-SG identified its [scope of work](#), which has been shared for feedback from the community on whether the questions identified are all relevant for this study and whether there are any other issues it should also consider. RZ-LGR-SG will consider the community input to finalize the scope of its work, develop the related recommendations and share these recommendations with the community before finalization.

## Section II: Contributors

*At the time this report was prepared, a total of two (2) 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:

Name	Submitted by	Initials
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG

### Individuals:

Name	Affiliation (if provided)	Initials
Mahesh M.		MM

## Section III: Summary of Comments

*General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer 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).*

MM showed support of this work.

NCSG reviewed the principles and the proposed scope and makes the following comments:

NCSG1. For question 2 in the scope, NCSG is unclear whether single character IDNs is within the purview of the RZ-LGR-SG, even from a technical perspective.

RZ-LGR-SG agrees that allowing single character IDN TLDs is a policy decision. However, the advice issued by Security and Stability Advisory Committee (SSAC) in its [SAC052](#) report may have additional implications beyond the regular use of RZ-LGR in case single character IDN TLDs are allowed. Therefore, to investigate any such implications, the SG is currently keeping this item in scope while carefully limiting its analysis within the technical context.

NCSG2. For question 6, NCSG is of the opinion that the RZ-LGR should be considered as ready to be used in applications once the particular script has been integrated by the integration panel.

RZ-LGR-SG agrees with NCSG that RZ-LGR should be used for string applications once the particular script has been integrated.

NCSG3. For question 12 and 13, the NCSG believes the procedure used to challenge RZ-LGR calculations, as well as the remedies provided in case of a successful challenge, should mirror what is already done regarding other ICANN services and community processes.

RZ-LGR-SG agrees that procedure to challenge RZ-LGR calculations should be in tune with the other ICANN services and community processes. As RZ-LGR is a new tool made available by the community following the LGR Procedure strictly, once integrated it will define a new process. SG will make its recommendation for addressing objections to RZ-LGR to assist the community in developing this new process.

NCSG4. In general, the NCSG emphasizes that the LGR procedure should always be followed.

RZ-LGR-SG agrees with NCSG and has identified and prioritized this as one of the principles. This is motivated by the fact that LGR Procedure has been developed by the community, already approved by the ICANN Board and has been the basis of developing the RZ-LGR by the Generation Panels (GPs) and the Integration Panel (IP).

NCSG5. The NCSG is of the opinion that the definition of admitted variants should be as narrow as possible and the variants management mechanisms as strict as possible, in order to prevent abuses.

RZ-LGR-SG acknowledges this as an important consideration, but also notes that defining variant code points is a matter for GPs and IP during the RZ-LGR development; limiting the number of variant labels eligible for delegation further beyond what is generated by the RZ-LGR is a subject of subsequent policy. Therefore, the SG considers this beyond its scope of work.

## 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.

RZ-LGR-SG thanks MM for his support and thanks NCSG for its detailed feedback.

The analysis of RZ-LGR Study Group on the comments by NCSG is provided in the previous section in [blue](#).