

# Report of Public Comments

<b>Title:</b>	<b>Translation and Transliteration of Contact Information PDP Initial Report</b>		
<b>Publication Date:</b>	19 February 2015		
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<b>Section I: General Overview and Next Steps</b>			
<p>The Translation and Transliteration of Contact Information Policy Development Process (PDP) Working Group (WG) is concerned with the way that contact information data – commonly referred to as 'Whois' – are collected and displayed within generic top-level domains (gTLDs). According to the <a href="#">Charter</a>, the PDP Working Group "is tasked to provide the GNSO Council with a policy recommendation regarding the translation and transliteration of contact information. As part of its deliberations on this issue, the PDP Working Group should, at a minimum, consider the following two Charter questions:</p> <ul style="list-style-type: none"><li>• Whether it is desirable to translate contact information to a single common language or transliterate contact information to a single common script?</li><li>• Who should decide who should bear the burden [of] translating contact information to a single common language or transliterating contact information to a single common script?</li></ul> <p>On 16 December 2014 the WG published an Initial Report for Public Comment. In addition to background information, an overview of the Working Group's deliberations and community input received to date, <a href="#">Initial Report</a> contains the following preliminary recommendations:</p> <p><b>Draft Recommendation #1</b> The Working Group could recommend that it is not desirable to make transformation of contact information mandatory. Any parties requiring transformation are free to do it ad hoc outside the Domain Name Relay Daemon.</p> <p><b>Draft Recommendation #2</b> The Working Group could recommend that any new Registration Directory Service (RDS) databases contemplated by ICANN should be capable of receiving input in the form of non-Latin script contact information. However, all data fields of such a new database should be tagged in ASCII to allow easy identification of what the different data entries represent and what language/script has been used by the registered name holder.</p>			

**Draft Recommendation #3** The Working Group could recommend that registered name holders enter their contact information data in the language or script appropriate for the language that the registrar operates in.

**Draft Recommendation #4** The Working Group could recommend that the registrar and registry assure that the data fields are consistent, that the entered contact information data are verified (in accordance with the Registrar Accreditation Agreement (RAA)) and that the data fields are correctly tagged to facilitate transformation if it is ever needed.

**Draft Recommendation #5** The Working Group could recommend that if registrars wish to perform transformation of contact information, these data should be presented as additional fields (in addition to the local script provided by the registrant), to allow for maximum accuracy.

**Draft Recommendation #6** The Working Group could recommend that the field names of the Domain Name Relay Daemon be translated into as many languages as possible.

**Draft Recommendation #7** Based on recommendations #1-#6, the question of who should bear the burden of translating or transliterating contact information to a single common script is moot.

## Section II: Contributors

*At the time this report was prepared, a total of three (3) 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
Business Community	Steve del Bianco	BC
Non Commercial Stakeholder Group (NCSG)	Rafik Dammak	NCSG
Intellectual Property Constituency (IPC)	Steven Metalitz	IPC
At-Large Advisory Committee	ICANN At-Large Staff	ALAC
Registries Stakeholder Group (RySG)	Paul Diaz	RySG
International Federation of Intellectual Property Attorneys	Alexandra Louage	FICPI
KeySystems Registrar	Volker Greimann	KeySys
dotShabaka	Yasmin Omer	dotSha
Ari Registry Services	Donna Austin	Ari
Registrars Stakeholder Group (RrSG)	Michele Neylon	BC

Individuals:

Name	Affiliation (if provided)	Initials
Michele Neylon	Blacknight Internet Solutions Ltd	MN

**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).*

The submission of comments can be largely grouped into two categories. Those that support the draft recommendations of the WG and those that oppose them. The former camp contains eight of the eleven public comments received (RrSG, RySG<sup>1</sup>, KeySys, ALAC, dotSha, NCSG, MN, Ari); the latter contains the remaining three (BC, IPC, FICPI).

The submitters supporting the draft recommendations, and thus opposing mandatory transformation, point to consistent search-ability, accessibility to domain registrations, unfeasibility of consistent transformation, and the cost/benefit ratio of mandatory transformation. Those submitters who oppose the draft recommendations, and thus support mandatory transformation of contact information, base their view on accessibility to registration data by those requesting contact information, transparency of the data submitted, and better search-ability in one common script – preferably US-ASCII.

KeySys suggests that there should be no requirement to translate or transliterate contact information to single common script. The burden of accession and understanding contact information is best placed on the side of the beneficiary of such data, i.e. the data requestor.

KeySys also suggests that introducing a mandatory requirement to transform WHOIS data into one or more commonly used languages would not support the goal of linguistic diversity, but would introduce costs, complexity and risk which outweigh the perceived benefits.

ARI supports a linguistically diverse and inclusive internet and encourages balancing the local needs of domain registrants with the global needs of internet participants and law enforcement. However, they do not consider that mandatory translation and transliteration of contact information into a single common language (English) or script (ASCII) will advance these goals.

dotSha supports the recommendation against mandatory transformation of contact information – as anything else would disproportionately burden small players and underserved regions. Helpfully, they

<sup>1</sup> The Registry Stakeholder Group submitted only a very short comment, indicating that they fully support those comments previously submitted by the RrSG – any comment submitted by the RrSG will therefore be marked as supported by RrSG/RySG.

also recommend further community discussion to understand better how the PDP's effort and the effort of other WHOIS related will fit together.

ALAC stated that transformation does not have to be mandatory; however, they suggested that there should be a provision for contact information to be maintained in two forms: a mandatory 'canonical' form in the original language, and an optional 'transformed' form after transformation. To this end, registrars should provide Registrants with the option of entering both forms while creating new entries or editing existing ones.

NCSG points out that requiring domain name holders not proficient in English/ASCII to submit data in a script they are not familiar with could potentially lead to contractual breaches beyond registrants' control. Also, NCSG does not believe that transformation is desirable or truly feasible. In addition, searching in the original script will be far more reliable than searching in transformed data – since consistency will almost be impossible to achieve/

Michele Neylon pointed out that contact information contains almost exclusively proper nouns, which are all but impossible to transform.

The IPC argues that having contact information in a large, potentially unlimited number of scripts, is troublesome and mandatory transformation of all contact information would allow for a more transparent, accessible and arguably more easily searchable database, and, given the global nature and use of the WHOIS, it is important to have WHOIS data transformed into the most common languages/script.

The IPC also suggests that if mandatory transformation was not recommended, any data entered into the contact information database ought to be displayed in machine-readable text.

Finally, according to the IPC's submission, the main burden should lie on the parties collecting and maintaining the information (i.e. registrar, registry, reseller).

The BC fears that without mandatory transformation, bad actors will shift to least translatable languages. They also maintain that mandatory transformation to globally accessible and searchable languages is necessary to the continued development of a secure and trusted internet. BC supports mandatory transformation but otherwise supports the recommendations that the registrar and registry assure that the fields are consistent, the data is verified, and that data fields are correctly tagged to facilitate transformation.

As far as costs are concerned, the BC believes they should be treated as part of the regular cost of doing business for the parties collecting and maintaining the information, registries, registrars and resellers

Similarly, FICPI indicates that the increasing internationalization of the Internet, besides creating new business opportunities for domain name holders, induces responsibilities for registrants, registries and registrars to maintain reliable and internationally readable WHOIS information.

#### 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.*

The comments submitted to the WG are all very clearly structured and the arguments are well presented. It is clear that the Business and IP Constituencies support mandatory transformation as they represent those that are most likely to request information for a variety of purposes.

Contrarily, Registrars and Registries, as well as others, oppose mandatory transformation, arguing that it would create costs – a blanket transformation of all non US-ASCII would not be cheap – that are most likely, according to them, passed on to the registrants. Therefore, they believe that if somebody needs to access contact information that is not submitted in US-ASCII, it is their responsibility to transform and to bear all associated costs.

Still, there is some common ground as all submitters agree that registrants should be able to submit registration data in languages other than just US-ASCII; allowing for a more globalized domain name system.

Following this public comment, WG members will have to assess the arguments brought forward and integrate them into their Final Report. The WG will have to decide – based on the merit of arguments presented – whether or not submission of international registration data (IRD) should be possible and if so, whether data should be mandatorily transformed. Once such a decision is taken it can then be qualified by determining which languages can be submitted and displayed in any existing or future WHOIS database or whether data must be transformed and if so into which language or script.

Finally, as several submissions to the public comment forum pointed out, the WG ought to set their work into the context of parallel WHOIS efforts, especially the work of the Expert Working Group on International Registration Data, who's Final Report will be released in the coming weeks.