

## Report of Public Comments

<b>Title:</b>	<b>Initial report on Universal Acceptance of IDN TLD's</b>		
<b>Publication Date:</b>	23 May 2012		
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<b>Comment Period:</b>		<b>Important Information Links</b>	
Open Date:	6 January 2012		Announcement
Close Date:	13 April 2012		Public Comment Box
Time (UTC):	23.59		View Comments Submitted
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<b>Section I: General Overview and Next Steps</b>			
<p>The JIG Initial Report on Universal Acceptance was published on 6 January and closed on 13 April 2012. The Initial Report reflects the preliminary stocktaking by the WG members of policy and other considerations relating to the Universal Acceptance of IDN TLDs. The community was requested to provide input and feed-back with respect to the following questions:</p> <ol style="list-style-type: none"> <li>1. Is the approach used by the JIG satisfactory?</li> <li>2. Are the identified areas of policy and coordination comprehensive?</li> <li>3. Has the JIG captured the major issues associated with Universal Acceptance of IDN TLDs? If not, what is missing?</li> </ol> <p>In total 5 comments were received and one spam email.</p> <p>The WG will closely review all submitted comments to revise and assess its preliminary stocktaking.</p>			
<b>Section II: Contributors</b>			
<i>At the time this report is prepared a total of 5 comments were received, excluding one (1) spam email. The contributors are listed below in order of receiving their comments.</i>			
<u>Organizations and Groups:</u>			
<b>Name</b>	<b>Submitted by</b>	<b>Initials</b>	
Registries Stakeholder Group	David Maher	RySG	
At-Large Advisory Committee	ICANN At-large Staff	ALAC	
National Health Council	Emily Noonan	NHC	

Individuals:

Name	Affiliation (if provided)	Initials
Chris Chaplow	Andalucia.com	CC
Joseph Yee		JY

**Section III: Summary of Comments**

*General disclaimer: In this section a broad and comprehensive summary of the comments is provided. It is not intended to include every specific aspect or stated position by each contributor. If the reader is interested in specific aspects of any of the summarized comments or the full context, she or he is advised to read the specific contributions, which can be found through the link referenced above ( View comments submitted)*

Comments RySG: According to the RySG the Interim paper is not clear regarding the type of feed-back and input that is solicited. Is the JIG looking for feed-back regarding the overall approach? If so the RySG will likely encourage and support the approach taken by the JIG. If the JIG is looking for feed-back whether the right questions are asked or hoping to get feed-back on the answers? In both cases the RySG is likely to be supportive of the direction undertaken by the JIG. Regarding the topics in Section III of the report, the RySG notes that the questions, although relevant, cover a lot of ground. Developing a response to all of them may take considerable time. The RySG seeks clarification of the intent of the JIG WG.

Comments ALAC: Whilst acknowledging that ICANN may not directly solve the issue of Universal Acceptance, ALAC supports the view of the JIG that ICANN has influence to promote the Universal Acceptance of IDN TLD's through the different processes available to exert influence (internet applications, supportive policies etc.) and through the stakeholders identified by the JIG. The ALAC notes the JIG could also look into inclusion of the Network Operator Groups ( NOG's) , GAC , ITU. The ALAC welcomes questions about prioritization of ICANN 's efforts on Universal Acceptance. ALAC notes that although ICANN by its very nature is a technical coordination body, some of the issues identified can not be resolved through a technical solution and this should not deter ICANN from taking a policy decision.

Comments NHC: The opening of the new gTLD process will allow any person, group or corporation to register almost everything as a top-level domain. This will put not-for profits at a great disadvantage compared to for-profits to defend, in particular as a result of a. string confusion resulting from the use of the name of a body part or disease or mimicking not-for profit sites as a TLD, and b. the cost and time required to apply for a new gTLD.

Comment CC: There is a high business value in the universal acceptance of new TLD's and IDN's. All issues listed in the Interim report result in lost business.

Comment JY: The Universal Acceptance of IDN TLD's is currently more determined by tools and services and less by registering and resolving. To improve the Universal Acceptance ICANN may want to focus on and work together with:

#### **Section IV: Analysis of Comments**

*This section is intended to provide an analysis and evaluation of the comments received, with an explanation by the Working Group.*

According to its charter the goal of the joint ccNSO-GNSO IDN working group mandate is to identify and explore issues and topics of common interest, if any, and of relevance to both IDN ccTLD and new gTLD implementation processes, and report on such an identified issues to the ccNSO and GNSO Councils and propose a methodology to address an issue. Therefore, whatever the merits of the comments and feed-back of the NHC, taking these comments into consideration is considered of out of scope of the JIG's mandate.

As to the other comments they are considered to be in support of the approach undertaken by the JIG and supportive of the need to ensure universal acceptance of IDN TLD and consider it a priority. It is also acknowledged that ICANN's mandate is limited i.e. not all issues raised can be resolved through ICANN processes, but need the involvement of other communities. As to the list of questions raised, some suggestions were made to include outreach to particular communities (see comment JY). At the same time, the RySG cautioned against the possible time it may take to just answering all the questions raised. The JIG will provide the requested clarification in its next report