

АНО "РЦИ"

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тел./факс +7.9023710117  
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РУССКОЯЗЫЧНЫЙ  
ЦЕНТР ИНТЕРНЕТ

<http://домены.py>

ИНН 7730164759, ОКПО 14168878, ОКВЭД 72.60 52.11 74.14  
р.с 40703810416000007832 в ЗАО КБ "ГУТАБАНК", г.Москва  
кор.с. 3010181010000000716, БИК 044525716

To:

Mr. Paul Twomey  
President and CEO of ICANN

Cc:

Mr. Peter Dengate Thrush  
ICANN Chairman of the Board

Internet Corporation for Assigned Names and Numbers (ICANN)  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292-6601  
USA



Dear Mr. Twomey,

We must select the correct IDN string for Russia to use in its ccTLD. That is the Cyrillic string .py.

Historically over thousands of years, Russians have proudly used a single name for their country, in Cyrillic of course. And pronunciation of the country name in Russian – "ROOS" – is similar to the way one pronounces "Russia" in English and also generally around the world.

To date the ASCII ccTLD designated by ICANN for Russia, based on ISO 3166-1, and used by Russians for more than a decade, is the string ".ru". This is naturally pronounced "ROO" by all Russians, as in "kangaROO". The Cyrillic string ".py", being a natural shortening of the country name pronounced "ROOS", is also pronounced "ROO". Thus for more than a decade, Russian Internet users have always pronounced the ending of every domestic web-site as "dot ROO". And they have named the Russian segment of the Internet "ROO-net".

In virtually all conversation, writings, advertisements and billboards, all over the nation, the transliteration/translation of any web-site identifier or of an email address has been ".py" - the Cyrillic that is pronounced "ROO". This has incurred billions of rubles spent over decades and has become ingrained in use by the 25 million Russian Internet users and the 250 million Russian population at large.

At the recent, and the largest, annual Russian Internet Forum, RIF-2008 ([www.rif.ru](http://www.rif.ru)), the newly elected President of Russia, Dmitry Medvedev, refers repeatedly to the Russian Internet ONLY as a "ROO-net" (<http://2008.rif.ru/salutations/>).

All the search engines, such as Google and Yahoo or Yandex (the major Russian search engine), link to hundreds of millions of websites in Russian, if you enter ".py" in the search bar. The most popular websites in Russia, and the major media websites, have named themselves to be ".py" sites on their main WebPages (see Attach. 1).

To a Russian speaker it is unthinkable that any ICANN-designated IDN TLD intended for the country Russia be anything other than ".py". That is simply unthinkable.

Moreover, the Cyrillic ".py" – now for long years – has in fact already become firmly entrenched in Russian use of the Internet. Of course, that is confirmed just above. The history over these years speaks further.

ICANN showed no interest in addressing the needs of IDN worldwide when the IDN technology was widely available and tested in Asia, from 1999. In Russia – as in similar indigenous launches in China, Arabia and elsewhere – an indigenous IDN TLD Cyrillic ".py" launched several years ago. That Cyrillic ".py" has been successfully operational since then. The many facets of Russia's Internet community have supported it.

That includes most Registrars and Resellers, and many ISPs are supporting. For example the dominant national Cybercafe chain, with thousands of outlets, has supported it for over five years.

With many thousands of names registered, Cyrillic ".py" also enjoys widespread media support. Most significantly, corporations and other institutions have registered these ".py" domains and have been including them in their advertising campaigns for years. Websites of the President of Russia, Coca-Cola, Amazon etc are among them. The deployed technology follows the IDNA standard, recommended by IETF since 2003 and approved by ICANN. Critically and very responsibly, Russia has taken the conservative approach of registering ONLY Cyrillic characters in front of its Cyrillic ".py".

Now, ICANN in the past year has stepped up belatedly to solve the IDN "mess", finally - a step we wholeheartedly applaud. In various discussion "tracks" about deploying country-code IDN equivalents, there has been a suggestion that Cyrillic ".py" should not be designated to Russia. The grounds? It is visually similar to the existing ASCII ccTLD string ".py", assigned to Paraguay and used by this respected nation for over a decade.

This argument holds that someone could register a string composed of Cyrillic characters preceding the ASCII ".py". The purpose would be intentional confusion with another registration, but fully Cyrillic, one with the same preceding characters followed of course by a Cyrillic IDN ".py", not ASCII. As we know, this is called "homographic spoofing".

The difference between Cyrillic and ASCII, when these two characters are combined as capital letters, is obvious to any native Russian speaker. When the characters are lower-case characters, there is similarity. But beyond that, almost all this undesirable homographic spoofing goes away if ICANN had previously followed the obvious guideline IETF expected, when it formalized IDNA: namely, that any and all IDN domain names must be in a SINGLE script throughout. A wise deployment would have restricted registration to ONLY the characters normally used in a single language script.

Unicode may be an all-encompassing character-set, and many European languages do share a large Latin character sub-set. This may have encouraged IDN.ascii composite domains, during the original Versign testbed in 2000 and in the formal deployments, later, after 2003 and continuing today. But if wisdom had prevailed instead, the rules for Paraguay's ".py" would have allowed for registering only ASCII characters relevant to Spanish or Guarani in front (Guarani is Paraguay's indigenous language and uses European Roman characters). And Russia's Cyrillic ".py" would have only Russian Cyrillic characters in front.

We in Russia exercised early and continuing prudence with our ".py" where only Cyrillic characters are allowed to precede the Cyrillic TLD. If ICANN had helped us by adopting a similar restraint in its practice, most of the current homographic spoofing would have been eliminated. Homographic spoofing would be seen for the "Red Herring" argument that it is. And the needs of Russia's hundreds of millions would not be sidelined owing to historical errors.

Needless to say, we don't want at stake inside Russia the attractiveness and fairness of ICANN as legitimate world arbiter for the Internet.

Even if the current final draft on policy for IDN gTLDs continues to allow mixed-script registrations between first and top levels in the domain name - which could legitimate them - a modicum of sense prevailed in finally disallowing mixed script within a level itself. This does illustrate that distinctions among language scripts can and, so, must be made.

As no deployments of IDN gTLDs have occurred yet, it is still not too late to reverse this fundamental error for IDN gTLDs.

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Since the debate on IDN ccTLDs is at an earlier stage, if not for IDN gTLDs, at least for IDN ccTLDs caution should and must be exercised. Only a single script should be allowed all the way through first, top and other levels.

In short, we applaud ICANN's renewed, if belated, interest in IDN TLDs. And we are happy that ICANN is considering the needs of Russians. Russians want, and ICANN must designate to Russians, Cyrillic ".py".

In fact, Paraguay's NIC (NIC.py) has, on its own, wisely and responsibly obviated the historical error. On their own, they have allowed only registrations in Latin characters. And except for a small percentage of domains, they also have only registered third-level domains behind com.py, net.py, edu.py, org.py, mil.py, and gov.py. Of course the third level is inhospitable to spoofing, if Paraguay did not limit registrations only to Latin characters - which in fact it does limit.

On its own Paraguay has conducted its NIC responsibly, so there indeed is no barrier to Paraguay and Russia cooperating happily together – Paraguay with ASCII and Russia with Cyrillic.

Those who would put the red herring of homographic spoofing as an obstacle fail to understand the fundamentals.

(1) While the two ".py's" may be visually similar when in lower case, spoofing can be eliminated with suitable and simple conditions in the agreement with end-users. In the unlikely event, spoofers' names will be blocked and taken from them, then offered to the good-will owner of the name that is already registered and visually similar.

(2) Spoofing can be vastly reduced if ICANN simply elects to allow only a single script all the way through first, top and other levels. This would just follow the good practice of the Paraguay NIC.

Spoofing is a crime and should be treated accordingly. It is monstrous, however, to hold a whole nation hostage to petty thievery. That indeed would not be the right policy. We do believe that remote possibilities, defused as above, will not derail ICANN from leading the Internet Community in the right direction.

Yours Sincerely,

Alexei Sozonov  
Russian Language Name Internet Consortium, [www.rlnic.ru](http://www.rlnic.ru)

Sergey Sharikov  
Regtime.net, ICANN Accredited Registrar, [www.regtime.net](http://www.regtime.net)

## TOP100 most popular Russian «.RU» websites .

1. [«В Контакте.ру» - social network](http://vkontakte.ru)  
vkontakte.ru — Quote ind: 13000.
2. ["Правда.Ру" – Internet version of one of oldest and most popular newspaper](http://www.pravda.ru)  
www.pravda.ru — Quote ind: 13000.
3. ["Дни.ру" – popular news portal/electronic newspaper](http://www.dni.ru)  
www.dni.ru — Quote ind: 10000.
4. ["в Отпуск.ру" – popular travel/ vacation portal](http://www.votpusk.ru)  
www.votpusk.ru — Quote ind: 10000.
5. ["Фонтанка.ру" - popular news portal/electronic newspaper](http://www.fontanka.ru)  
www.fontanka.ru — Quote ind: 8600.
6. ["Проза.ру" - popular literature portal](http://www.proza.ru)  
www.proza.ru — Quote ind: 8400.
7. ["Арендатор.Ру" - popular real estate portal](http://www.arendator.ru)  
www.arendator.ru — Quote ind: 8200.
8. ["Квадрум.ру" - popular news portal/electronic newspaper](http://www.kvadroom.ru)  
www.kvadroom.ru — Quote ind: 8200.
9. ["Банкир.ру" - popular banking portal](http://bankir.ru)  
bankir.ru — Quote ind: 7400.
10. ["Полит.ру" - popular politics discussion/analytcs portal](http://www.polit.ru)  
www.polit.ru — Quote ind: 7400.
11. ["Клерк.ру" - popular bookkeeping portal](http://www.klerk.ru)  
www.klerk.ru — Quote ind: 7300.
12. ["7я.ру" - popular family issues portal](http://www.7ya.ru)  
www.7ya.ru — Quote ind: 5200.
13. ["Седмица.ру"- popular Orthodox church portal](http://www.sedmitza.ru)  
www.sedmitza.ru — Quote ind: 5200.
14. ["ру/ Ководство" popular web portal](http://www.artlebedev.ru/kovodstvo)  
www.artlebedev.ru/kovodstvo — Quote ind: 4900.
15. ["Грани.ру" - popular news portal/electronic newspaper](http://grani.ru)  
grani.ru — Quote ind: 4300.
16. ["Ремонтируем.ру" - popular building portal](http://www.rmnt.ru)  
www.rmnt.ru — Quote ind: 4200.

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17. ["Общая газета.ру" popular news portal/electronic newspaper](http://www.og.ru)  
[www.og.ru](http://www.og.ru) — Quote ind: 3900.
  18. ["Компромат.ру" - popular news portal/electronic newspaper](http://www.compromat.ru)  
[www.compromat.ru](http://www.compromat.ru) — Quote ind: 3800.
  19. ["ЮГА.ру" - popular news portal](http://www.yuga.ru)  
[www.yuga.ru](http://www.yuga.ru) — Quote ind: 3800.
  20. ["Накануне.ру" - popular news portal/electronic newspaper](http://www.nakanune.ru)  
Ленты [www.nakanune.ru](http://www.nakanune.ru) — Quote ind: 3700.
  21. ["Горбушка.ру" - popular electronic shopping portal](http://www.gorbushka.ru)  
[www.gorbushka.ru](http://www.gorbushka.ru) — Quote ind: 3700.
  22. ["Точка Ру" - big ISP](http://www.tochka.ru)  
[www.tochka.ru](http://www.tochka.ru) — Quote ind: 3600.
  23. ["Кредо.ру" - popular Orthodox church portal](http://www.portal-credo.ru)  
[www.portal-credo.ru](http://www.portal-credo.ru) — Quote ind: 3400.
  24. ["Релком.ру" – big ISP](http://www.relcom.ru)  
[www.relcom.ru](http://www.relcom.ru) — Quote ind: 3400.
  25. ["Парк.ру" popular news portal/electronic newspaper](http://www.park.ru)  
[www.park.ru](http://www.park.ru) — Quote ind: 3300.
  26. ["Металлопрокат.Ру" – metals trade portal](http://www.metalloprokat.ru)  
[www.metalloprokat.ru](http://www.metalloprokat.ru) — Quote ind: 3300.
  27. ["Песни.ру" - popular music portal](http://www.pesni.ru)  
[www.pesni.ru](http://www.pesni.ru) — Quote ind: 3300.
  28. ["Ресторан.ру" popular dining/restaurant portal](http://www.restoran.ru)  
[www.restoran.ru](http://www.restoran.ru) — Quote ind: 3100.
  29. ["Туры.ру" - popular travel/ vacation portal](http://www.tury.ru)  
[www.tury.ru](http://www.tury.ru) — Quote ind: 3000.
  30. ["Вереск.ру" - popular music portal](http://www.veresk.ru)  
[www.veresk.ru](http://www.veresk.ru) — Quote ind: 2700.
  31. ["Чемпионат.ру" - popular sports portal](http://www.championat.ru)  
[www.championat.ru](http://www.championat.ru) — Quote ind: 2700.
  32. ["Фергана.Ру" – popular news agency](http://www.ferghana.ru)  
[www.ferghana.ru](http://www.ferghana.ru) — Quote ind: 2700.
  33. ["WebПарк.ру" - popular portal](http://www.webpark.ru)  
[www.webpark.ru](http://www.webpark.ru) — Quote ind: 2600.

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34. ["Арטהаус.Ру" - popular portal](#)  
[www.arthouse.ru](http://www.arthouse.ru) — Quote ind: 2600.
35. ["Ислам.Ру" - popular Islamic church portal](#)  
[www.islam.ru](http://www.islam.ru) — Quote ind: 2600.
36. ["Много.ру" - popular portal](#)  
[www.mnogo.ru](http://www.mnogo.ru) — Quote ind: 2600.
37. ["Партер.Ру" - popular portal](#)  
[www.parter.ru](http://www.parter.ru) — Quote ind: 2600.
38. ["Пон.ру" – popular Real estate portal](#)  
[www.pon.ru](http://www.pon.ru) — Quote ind: 2500.
39. ["Евро-футбол.ру" - popular sports portal](#)  
[www.euro-football.ru](http://www.euro-football.ru) — Quote ind: 2500.
40. ["Коттедж.ру" - popular Real estate portal](#)  
[www.kottedj.ru](http://www.kottedj.ru) — Quote ind: 2400.
41. ["Техпортал.ру" - popular security portal](#)  
[www.techportal.ru](http://www.techportal.ru) — Quote ind: 2300.
42. ["РТКомм.ру" – big ISP](#)  
[www.rtcomm.ru](http://www.rtcomm.ru) — Quote ind: 2300.
43. ["Мединфо.ру" - popular medicine portal](#)  
[www.medinfo.ru](http://www.medinfo.ru) — Quote ind: 2200.
44. ["оВебМани.Ру" - popular security payment portal](#)  
[owebmoney.ru](http://owebmoney.ru) — Quote ind: 2200.
45. ["Молоток.ру" - popular web-auction](#)  
[molotok.ru](http://molotok.ru) — Quote ind: 2100.
46. ["Богослов.ру" - popular Orthodox church portal](#)  
[www.bogoslov.ru](http://www.bogoslov.ru) — Quote ind: 2100.
47. ["Лениздат.ру" - popular news portal/electronic newspaper](#)  
[www.lenizdat.ru](http://www.lenizdat.ru) — Quote ind: 2000.
48. ["Мосриелт.ру" - popular Real estate portal](#)  
[www.mosrielt.ru](http://www.mosrielt.ru) — Quote ind: 2000.

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49. ["Перевозки.ру" - popular logistic portal](#)  
[www.perevozki.ru](http://www.perevozki.ru) — Quote ind: 1900.
50. ["Привет!ру" – social network](#)  
[privet.ru](http://privet.ru) — Quote ind: 1900.
51. ["Кино.Ру" - popular portal](#)  
[www.kino.ru](http://www.kino.ru) — Quote ind: 1900.
52. ["Дамочка.ру" – popular dating portal](#)  
[damochka.ru](http://damochka.ru) — Quote ind: 1900.
53. ["АвтоНавигатор.ру" - popular auto portal](#)  
[www.autonavigator.ru](http://www.autonavigator.ru) — Quote ind: 1800.
54. ["Контрамарка.ру" - popular ticket portal](#)  
[www.kontramarka.ru](http://www.kontramarka.ru) — Quote ind: 1800.
55. ["Тендерит.ру" - popular PR portal](#)  
[www.tenderit.ru](http://www.tenderit.ru) — Quote ind: 1800.
56. ["ФотоФорум.Ру" popular photo portal](#)  
[www.photoforum.ru](http://www.photoforum.ru) — Quote ind: 1700.
57. ["ЗакС.ру" - popular news portal](#)  
[www.zaks.ru](http://www.zaks.ru) — Quote ind: 1700.
58. ["Градусник.ру"- popular health portal](#)  
[www.gradusnik.ru](http://www.gradusnik.ru) — Quote ind: 1700.
59. ["Исходники.ру" - popular programming portal](#)  
[www.sources.ru](http://www.sources.ru) — Quote ind: 1700.
60. ["Риэлто.ру" - popular Real estate portal](#)  
[www.realto.ru](http://www.realto.ru) — Quote ind: 1700.
61. ["Бетон.Ру – popular construction porta"](#)  
[www.beton.ru](http://www.beton.ru) — Quote ind: 1600.
62. ["Ева.ру. popular femaile portal"](#)  
[www.eva.ru](http://www.eva.ru) — Quote ind: 1600.
63. ["Политком.ру" – popular politics discussion portal](#)  
[www.politcom.ru](http://www.politcom.ru) — Quote ind: 1600.

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64. ["Клуб.ру" - popular club portal](#)  
[www.club.ru](http://www.club.ru) — Quote ind: 1600.
65. ["ФотоКритик.Ру" - popular photo portal](#)  
[www.fotokritik.ru](http://www.fotokritik.ru) — Quote ind: 1600.
66. ["Корабел.ру" - popular shipbuilding portal](#)  
[www.korabel.ru](http://www.korabel.ru) — Quote ind: 1500.
67. ["ШколаЖизни.ру" - popular internet journal](#)  
[shkolazhizni.ru](http://shkolazhizni.ru) — Quote ind: 1500.
68. ["Детство.ру" - popular parenting portal](#)  
[detstvo.ru](http://detstvo.ru) — Quote ind: 1500.
69. ["Аниматор.ру" - popular cartoon portal](#)  
[www.animator.ru](http://www animator.ru) — Quote ind: 1500.
70. ["Столетие.ру" - popular internet journal](#)  
[www.stoletie.ru](http://www.stoletie.ru) — Quote ind: 1500.
71. ["Триникси.ру" - popular entertainment portal](#)  
[trinixy.ru](http://trinixy.ru) — Quote ind: 1500.
72. ["Литургия.ру" - popular Orthodox church portal](#)  
[www.liturgy.ru](http://www.liturgy.ru) — Quote ind: 1500.
73. ["Интермода.Ру" - popular fashion portal](#)  
[www.intermoda.ru](http://www.intermoda.ru) — Quote ind: 1400.
74. ["Кулина.Ру" - popular cooking portal](#)  
[www.kulina.ru](http://www.kulina.ru) — Quote ind: 1400.
75. ["Великий Новгород.Ру" - popular portal](#)  
[www.velikiynovgorod.ru](http://www.velikiynovgorod.ru) — Quote ind: 1400.
76. ["Куда.ру" - popular travel portal](#)  
[www.kuda.ru](http://www.kuda.ru) — Quote ind: 1400.
77. ["Карикатура.ру" - popular entertainment portal](#)  
[caricatura.ru](http://caricatura.ru) — Quote ind: 1400.



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78. ["Поэзия.ру" - popular literature portl](#)  
[www.poezia.ru](http://www.poezia.ru) — Quote ind: 1400.
79. ["Электроб.ру"-popular electronic shop](#)  
[www.electrob.ru](http://www.electrob.ru) — Quote ind: 1300.
80. ["100Товаров.ру" - popular electronic shop](#)  
[www.100tovarov.ru](http://www.100tovarov.ru) — Quote ind: 1300.
81. ["Лингва.ру" - popular English language courses](#)  
[www.lingua.ru](http://www.lingua.ru) — Quote ind: 1300.
82. ["Отдых.ру" - popular travel portal](#)  
[www.otdyh.ru](http://www.otdyh.ru) — Quote ind: 1300.
83. [Банк24.ру popular banking portal](#)  
[www.bank24.ru](http://www.bank24.ru) — Quote ind: 1300.
84. ["Ру-Мамбо" - popular content managing portal](#)  
[ru-mambo.ru](http://ru-mambo.ru) — Quote ind: 1300.
85. ["110км.ру" - popular auto portal](#)  
[110km.ru](http://110km.ru) — Quote ind: 1300.
86. ["Пресс-атташе.ру" - popular media portal](#)  
[www.press-attache.ru](http://www.press-attache.ru) — Quote ind: 1200.
87. ["Таможня.ру" - popular russian custom portal](#)  
[www.tamognia.ru](http://www.tamognia.ru) — Quote ind: 1200.
88. ["Роддома.ру" - popular medical/parenting portal](#)  
[www.roddoma.ru](http://www.roddoma.ru) — Quote ind: 1200.
89. ["Играй.ру"- popular electronic games portal](#)  
[www.igray.ru](http://www.igray.ru) — Quote ind: 1200.
90. ["СПб-Новостройка.ру" - popular real estate portal](#)  
[www.spbnovostroyka.ru](http://www.spbnovostroyka.ru) — Quote ind: 1200.
91. ["Калкулэйт.Ру" – packaging manufacturer](#)  
[www.calculate.ru](http://www.calculate.ru) — Quote ind: 1200.
92. ["Грипп.Ру" - popular medical portal](#)  
[www.gripp.ru](http://www.gripp.ru) — Quote ind: 1200.

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РУССКОЯЗЫЧНЫЙ  
ЦЕНТР ИНТЕРНЕТ

http://домены.ру

93. ["Косметичка.ру" - popular woman's journal](http://www.kosmetichka.ru)  
[www.kosmetichka.ru](http://www.kosmetichka.ru) — Quote ind: 1100.
94. ["Леспром.ру" – forestry trading portal](http://les.lesprom.com)  
[les.lesprom.com](http://les.lesprom.com) — Quote ind: 1100.
95. ["Брянск.ру" - popular daily newspaper](http://briansk.ru)  
[briansk.ru](http://briansk.ru) — Quote ind: 1100.
96. ["Ванна.ру" - popular on-line shop](http://www.wanna.ru)  
[www.wanna.ru](http://www.wanna.ru) — Quote ind: 1100.
97. ["Лестница.ру" - popular stairs on-line shop/portal](http://www.lestnitsa.ru)  
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