Report of Public Comments

Title:	IDN Variant TLD Program-Interim Report Examining the User Experience Implications of Active Variant TLDs
Publication Date:	21 December 2012
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Comment & Reply Comment Period:		**Important Information Links**
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Section I: General Overview and Next Steps

To better understand and address the challenges surrounding the activation of variant internationalized top-level domains (IDNs), this interim report was published for public comment.

Based on the input received in this public forum, ICANN will produce a draft final report that incorporates the community feedback, with proposed guidelines and recommendations for active variant TLDs. The draft final report will be published for second and final round of Public Comment in January 2013.

Section II: Contributors

At the time this report was prepared, a total of 4 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
China Internet Network Information Center (CNNIC)	Hongbin Zhu	HZ
At-Large Advisory Committee (ALAC)		ALAC

INDIVIDUALS:

Name	Affiliation (if provided)	Initials
Chris Dillon		CD
Joseph Yee		JY

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).*

GENERAL COMMENTS

Report Format--Summary Table Suggestion. For the report, sometimes it is hard to grasp all problems/issues identified. I suggest adding a summary table at the end of the issue section--one issue per row, with 7 columns for each principle, and check which one applied. Then you have a "street view" of each issue and a "map view" of overall. *J. Yee (7 Nov. 2012)*

Security. The report mentions that some ccTLD registries have already operated IDN variant TLDs for years. There are no outstanding operation issues to date, so it is not true that introducing variant TLDs efficiently will cause significant security problems. *CNNIC (13 Dec. 2012)*

Addressing Scarcity and Acceptance of IDN TLDs and User Expectations.
- Properly solving the IDN Variant issues is critical not only for the security and stability of the DNS but also for linguistic and cultural integrity from the perspective of many non-ASCII communities. According to our operating experience, end users strongly expect the variant TLDs to be delegated and used simultaneously for better user experience, since the variants are recognized as the same meaning. *CNNIC (13 Dec. 2012)*
- The interim report raised many challenges about the IDN variant user experience, which may increase technical concerns. In fact, many of those challenges are caused by the current lack of acceptance and scarcity of IDN TLDs, especially the variant TLDs compared with ASCII ones. This situation can be addressed by introducing more IDN variant TLDs to the root quickly and smoothly consistent with current accepted practices, since emerging variant TLDs will help to cultivate the market acceptance and awareness of software vendors with the joint efforts of IDN communities. *CNNIC (13 Dec. 2012)*

- If many IDN variant TLDs are held back, the user experience will be challenged, and all the challenges cannot be solved efficiently in time with such little awareness among the software vendors and new registries. It is also predictable that new challenges will constantly show up. *CNNIC (13 Dec. 2012)*

Timing Concerns--IDN Variants.
- It is obvious that almost all the new gTLD applicants do not want their TLDs to be disadvantaged because of late delegation. Although IDNs are claimed to be prioritized, it is still not clear that IDN variants can be delegated first. In fact, the IDN variant project is still ongoing which creates much uncertainty about whether IDN variants can be delegated to the root

simultaneously. We are very concerned about whether the IDNs can be delegated on time for better serving of our registrants and end users. *CNNIC (13 Dec. 2012)*

- The IDN variant issue is more complicated for contracting with ICANN. Unlike the ASCII domain names which will lead to immediate acceptance of the standard contract, IDNs need more time for negotiating the fee structure and its compliance to TMCH rules. *CNNIC (13 Dec. 2012)*
- If the IDN prioritization needs to be reinforced, all the necessary preparation for IDN delegation in the root, including the variant issue research project, must also be conducted in an efficient manner as consistent with the pace of IDN delegation. If not, the IDN community will still be disadvantaged in competition with ASCII TLDs, and the original goal of IDN prioritization will be hampered. *CNNIC (13 Dec. 2012)*
- ICANN should give more clarification on the estimated time for IDN Variants TLD delegation and what are the requirements for IDN Variants delegation to ensure that IDNs can really get prioritized for the public interest. *CNNIC (13 Dec. 2012)*

Addressing Issues Related to User Experience. ALAC commends the generally thorough stocktaking of issues related to user experience of IDN Variant TLDs presented by the Interim Report. At the same time, and as touched on in the report, these issues may be mitigated against by registry policy measures along with relevant materials and resources for users (including administrative and technical users). *ALAC (14 Dec. 2012)*

Final Report--Clarification Requested and Community Input Concern. It is unclear from the language of the interim report whether we are talking about 2 types of "Final Report"--one for finalizing of this report which identifies the issues (supposedly to be completed within 90 days after the closure of the public forum), and another completely different one which is the second part of the study which contains the guidelines and recommendations. Or in fact they are one and the same? Should they be two completely different reports, the process makes sense; however, if they are one and the same, there is significant concern that the community is not involved properly in the development of the guidelines. *ALAC (14 Dec. 2012)*

Detail requested--differentiation between languages in guidelines and recommendations. While the Interim Report identifies that there may be differences in the needs and user expectations for different linguistic communities, there is no indication whether the guidelines and recommendations would be differentiated between languages, how they would be arrived at, and how affected linguistic communities would be consulted before such recommendations were made and guidelines developed. It would be useful for the team to better describe the process through which this anticipated work will be compiled. *ALAC (14 Dec. 2012)*

Balancing the concerns of linguistic communities and the technical community.
- As an overall ICANN policy matter, the implementation of IDN Variant TLDs requires balance between the concerns of the linguistic communities (i.e., focus on end users and maximal variant label set to enable diverse expression and easier accessibility) and the technical community (i.e., focus on security and stability of the DNS, stipulating the minimal number of

variant labels, if any, be added to the root zone). *ALAC (14 Dec. 2012)*

- The Interim Report did not go further to explain how this study (and the further guidelines and recommendations) would/could be used to mitigate against the predominance of either of the two views of conservativeness to achieve a reasonable compromise suitable for the implementation of IDN Variant TLDs. *ALAC (14 Dec. 2012)*

ALAC Advice for Distinguishing Between Key Issues. In considering potential issues and how the ICANN community can mitigate against them, the team should provide better clarity to distinguish between:
(1) Issues that can and should be implemented as ICANN policies (e.g., directly through Registries and Registrars);
(2) Issues for which ICANN policies have stronger influence (e.g., recommendations for registrants); and
(3) Issues which ICANN and the ICANN community would produce materials and conduct outreach to raise awareness (e.g., guidelines for the technical community or the legal community).
ALAC (14 Dec. 2012)

Linguistic Communities' Input Into Guidelines. Guidelines and recommendations sensitive to linguistic communities are important and thus should be developed with consultation from and best through bottom-up processes by the affected linguistic communities, and more importantly to identify critical aspects that should be implemented as requirements for IDN TLD registries. *ALAC (14 Dec. 2012)*

- E.g., in the Chinese IDN Variant case, statistics in the report showed that close to 20% of queries are directed towards the IDN Variant TLD, meaning that there is 1 user using the IDN Variant TLD for every 4 users using the primary IDN TLD.
- This presents strong evidence that ICANN should implement policies to require all Chinese IDN TLD registries to serve the preferred variant as the IDN Variant TLD, to ensure both consistency in the root and a reasonable user experience and consumer trust for IDN TLDs. *ALAC (14 Dec. 2012)*

Develop Separate Guidelines and Recommendations for Different Linguistic Communities. Separate guidelines and recommendations should be developed for different linguistic communities. As shown in the report, the requirements and needs of different linguistic communities for IDN Variant TLDs are different from each other. All the relevant policies, guidelines and recommendations should be developed with consultation and through bottom-up processes by the affected language communities. *ALAC (14 Dec. 2012)*

SPECIFIC COMMENTS

Section 3.1.1:
(1) Please explain the sentence "Variants due to digits are automatically activated." Is this concerned with Eastern and Western Arabic digits or bidirectional issues as outlined e.g. in sections 2 and 13 d. of the Arabic case study? *C. Dillon (26 Oct. 2012)*
(2) There is a lengthy discussion of ZWNJ in section 5 21. of the Arabic case study; however, mention of its implementation at the second level in Farsi domain names in section 3.1.1 of the interim report

is most interesting. Is there any more information? What has the actual experience been? *C. Dillon (26 Oct. 2012)*

Section 6.1.12--Variants not part of URL/URI/IRI . The examples in the report demonstrate that unequal variant management between TLD and the rest could lead to different resources/owners. So I believed that the P2-Security principles applied here as well. *J. Yee (31 Oct. 2012)*

New 6.3x for Network Routing and Filtering. Network management, such as routing and filtering, also need to be aware of variant in TLD. Firewall, content filtering (think of monitoring tools and service with parental control) and others use various techniques (IP-based, keywords matching, etc.), and domain-based techniques play an equally important part. If the domain-based techniques were not aware of variant, or mismanage variant rules, the result could range from ineffective to bad. *J. Yee (31 Oct. 2012)*

Section 7--Future Work. It is never enough to stress (again!) how users' experience on TLD variant is interdependent between TLD variant and many other components. *J. Yee (31 Oct. 2012)*

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.

We thank the community for the constructive feedback. Every comment will be considered by the study team when we issue the next version of report for public comment. Here is how we plan to address the comments:

Regarding "Report Format – Summary Table Suggestion", in the next version of report, a table summarizing the issues will be incorporated.

Regarding "Security", we took note of IDN community's operational experience and will make further observations about the difference between the root zone and other zones.

Regarding "Addressing Scarcity and Acceptance of IDN TLDs and User Expectations", we took note the community's concern and understand that some variants are requested in a way to meet the user expectation and lead to enhanced user experience on IDNs. We do not agree with the commentator that these problems are due to the lack of IDN variant TLDs, as IDN variants have been deployed at the second level for a while already.

Regarding "Timing Concerns", this is out of the scope of this project, but this concern has been

communicated to relevant ICANN staff.

Regarding "Addressing Issues Related to user Experience", we thank ALAC's note.

Regarding "Final Report-Clarifications and Community Input Concern", ICANN's plan is to publish the draft final report in January / February 2013 time frame for community input. The draft final report will include recommendations. After taking consideration of public input, a final report will be released by ICANN.

Regarding "Detail requested – differentiation between languages in guidelines", ICANN's current best thinking is guidelines are dependent on languages and scripts.

Regarding "Balancing the concerns of linguistic communities and technical community", we note this is an important issue and will be addressed in the recommendations of the draft final report.

Regarding "ALAC advice for Distinguishing Between Key Issues", we will use this framework in our recommendations.

Regarding "Linguistic communities' input into guidelines", we hear community's feedback that guidelines should be developed with community input, and will provide community sufficient opportunity for feedback and participation should those guidelines be developed.

Regarding "Separate guidelines and Recommendation for Different Linguistic Communities", so far we do not anticipate guidelines are dependent on languages and scripts.

Regarding Specific comments,

Regarding the first comment on Section 3.1.1, we offer the following explanation: (1) Arabic language uses Arabic-Indic digits (U+0660-U+0669). The software available for Arabic language end-users may also use ASCII digits. The policy is referring to these two sets. Regarding the second comment on the actual user experience, we have inquired the relevant ccTLD and will incorporate this in the next version of the report.

Regarding comments on Section 6.1.12 and 6.3X, we agree with the commentator will include these comments in our next iteration.