Report of Public Comments

Title:	IDN Variant TLD Program – The Development and Maintenance of the Label Generation Ruleset Process for the Root
Publication Date:	20 November 2012
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Comment Period:			Important Information Links	
Open Date:	24 September 2012		Announcement	
Close Date:	9 November 2012		Public Comment Box	
Time (UTC):	23.59		View Comments Submitted	

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Section I: General Overview and Next Steps

This public comment was opened to gather community feedback on the First Draft of the document on "Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels."

The project team, which includes expert consultants and a global team of volunteers, created a first draft document and sought community comment and input. Comments received in this forum as well as community feedback received during the Toronto ICANN meeting will be incorporated into the final draft and published for second and final round of Public Comment.

Section II: Contributors

At the time this report was prepared, a total of one community submission 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
SaudiNic	AbdulRahman Al-Ghadir	AG

Individuals:

Name	Affiliation (if provided)	Initials

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments

Variants should include rendering in multiple position for the same character

Basically, we do agree with the principle outlined in this document. In particular that the solution should adhere to the simplicity convention. However, we believe that the solution should also be comprehensive and take care of the very specific characteristics of languages (even if it appears to others as complex … please note that they are not complex to the language's native speakers).

For example, in Arabic language, a characters (e.g., Beh ب, code point U+0628) would have different shape depending in its position within a word. The letter (Beh) has multiple positions (ب ـب ـبـ بـ) (final, middle, beginning and isolated). Hence, when we are looking for variants to this character we should consider all the possible positions. In this case non-Arabic speakers might consider this situation as complex comparing to their language case which might cause a difference in understanding the term "simplicity" for each language.

Hence, simplicity is very important but completeness is also important. [AG]

Section IV: Analysis of Comments

Variants should include rendering in multiple position for the same character

Your comment is very much appreciated. The Label Generation Ruleset (LGR) Process Project team will consider your comment for the next update of the report prior to the posting for the final Public Comment.

However, strictly speaking, the comment concerns an actual proposed rule, and is not about the procedure itself. It is relevant, however, to the interpretation of "simplicity", and argues that the test for simplicity ought to be native users of the script and not naive implementers. In the proposed procedures there is a balancing act between adequate simplicity for implementers who may not be able to read or write in the script in question, and the question of reflecting the real uses of the script. That trade-off is to be worked out between the primary and secondary panels (now called the Generation and Integration panels respectively).

The document currently reads: "Any rule that depends on context will require very strong evidence that it is in fact required to write any useful mnemonics for some language users; the primary panel shall proceed on the presumption that a code point that requires context rules is likely to violate the Simplicity, Conservatism, and Usability principles. In any case, code points permitted by IDNA2008 under the CONTEXTO and CONTEXTJ rules are automatically excluded".