Report of Public Comments

Title:	Proposed IDN Guidelines Revision
Publication Date:	2 September 2011
Prepared By:	IDN Guidelines Revision Working Group

Comment Period:		Important Information Links	
Open Date:	27 July 2011	Announcement	
Close Date:	26 August 2011	Public Comment Box	
Time (UTC):	23.59 UTC	View Comments Submitted	

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Section I: General Overview and Next Steps

The proposed IDN Guidelines Revision was developed by the IDN Guidelines Revision Working Group (comprised of ccTLD and gTLD registry representatives with IDN experience supported by ICANN staff). The new draft modifies the current Version 2.2 to reflect the IDNABIS revision ("IDNA2008 protocol") of the initial IDNA protocol ("IDNA2003").

With the completion of the comment period and incorporation of changes based on comments received, the proposed version 3.0 of the IDN Guidelines will be sent to the ICANN Board for their consideration.

Section II: Contributors

At the time this report was prepared, a total of two community submissions had been posted to the Forum. The contributors 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

Individuals:

Name	Affiliation (if provided)	Initials
Simon Josefsson		SJ
Hugo Salgado	NIC Chile	HS

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).*

Two submissions were received during the public comment period on the proposed revision to the IDN Guidelines. The first came from Simon Josefsson in four numbered parts. The first is about RFC 5895 ("the mapping document") not appearing among the cited components of IDNA2008. The second and fourth call attention to need for stating the dependency of IDNA2008 on the Unicode version on which it operates, with specific regard to changes in the properties of a code point that determine if it is valid or disallowed by the protocol. The third is a request for clarification of what is meant by "all code point listings."

The second submission was made by Hugo Salgado who suggests including a recommendation that IDN registries and registrars warn about and disclaim limitations in the global support for IDNs in application software, especially in e-mail agents. He notes that the .CL registry introduced IDN in 2005 and a dissatisfied registrant has filed a claim in court.

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 Guidelines working group considered these remarks (which were submitted early during the public comment period) and consulted additionally with the authors of the IDNA2008 protocol about its dependency on Unicode versions. During these discussions need for a few additional editorial clarifications became apparent, as did the unintentional omission of a numbered section that appears in the version 2.2 of the Guidelines that is currently in effect. A [final version of the draft](#) with the missing section reinstated, and reflecting the received commentary, is posted herewith. A parallel copy indicates the changes in [red line](#). A review of the discussion during its preparation is presented below.

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Guideline 1: The reference to "shortest possible order" has been changed to "shortest practicable order". Josefsson's suggestion about adding a reference to RFC 5895 was not followed. That document is not cited in RFC 5890, which only makes reference to the precursor draft, "IDNA-Mapping", as a work in progress. Although the expectation was that this would subsequently be included in the document collection, it was not to be a required part of the protocol. The resulting RFC 5895 enumerates the normative components of the protocol and treats itself as external to them. Reference to the similarly informational RFC 5894 is retained, nonetheless, as it is fundamental

to the understanding of the protocol.

Guideline 2: The alternative of a domain that has become invalid under IDNA2008 being "held" by a registry has been added to its being "replaced" or "deleted". In all three cases, resolution within the zone is terminated.

Guideline 4: This has been clarified according to Josefsson's suggestion.

Guideline 5: This is a reinstatement of a Guideline that appears in the current version 2.2 and was inadvertently dropped in the posted draft of the proposed 3.0 revision.

Guideline 6: This has been reworded for purposes of clarification without substantive change.

Guideline 7: This now clarifies that the documentation of action specific to the transition between IDNA2003 and IDNA2008 does not include a listing of names subject to those actions.

Guideline 8: This now clarifies that these Guidelines are specific to IDNA and do not apply to any other form of ASCII-compatible encoding.

Guideline 9: This has been reworded to clarify intent.

Appendix A2: The potential consequences of changes to Unicode character properties are noted. This is in response to Josefsson's comment and is elaborated in Appendix B4.

Appendix B4: This has been added in detailed consideration of the point noted in Appendix A2.

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The suggested disclaimer regarding global implementation made by Salgado has not been added. ICANN conducts separate action regarding the universal acceptance of IDN domains and it presently appears more purposeful to avoid placing any constraint on that action in the Guidelines. Also, as the working group believes is already well known, IDNA2008 is only one component of the protocol support needed for e-mail address internationalization. The IETF is currently working on the broader EAI protocol. This embraces IDNA2008 but it is neither possible nor appropriate for the Guidelines to preempt the impending RFC. Compliant guidelines can be added when it has been published.

Version 3.0 of the Guidelines is the first to be released subsequent to the finalization of IDNA2008. (An initial discussion draft was posted three months after the RFCs were published.) A general transition between IDNA2003 and IDNA2010 is underway but it is not yet possible to foresee either its duration or all of the issues relevant to the Guidelines that may manifest themselves during its course.

A version 3.1 revision is already in preparation. This addresses a concern that became apparent during the final dialog surrounding the present revision, about need for contextual rules beyond those articulated in IDNA2008. A draft including that addition will be posted for public comment in the near future. This will also afford short-term ability to modify any other detail in Version 3.0 that might benefit from further clarification. Subsequent working group action will include consideration of the final report of the VIP Study, which is expected to provide a basis for additional extensions to the Guidelines.