

Report of Public Comments

Title:		
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Comment Period:		<p style="text-align: center;">Important Information Links</p> <p style="text-align: center;">Announcement</p> <p style="text-align: center;">Public Comment Box</p> <p style="text-align: center;">View Comments Submitted</p>
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Section I: General Overview and Next Steps		
<p>ICANN has conducted six case studies of individual scripts to investigate any issues that need to be resolved to facilitate a good user experience for IDN variant TLDs. This report provides a summary an analysis of comments submitted for the Arabic case study report. ICANN will complete a consolidated issues report that will summarize and synthesize the issues identified by the case study teams. It is expected that the results of the case studies will play a crucial role in the identification of solutions towards the delegation of IDN variant TLDs.</p>		
Section II: Contributors		
<p><i>At the time this report was prepared, a total of four 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.</i></p>		
<u>Organizations and Groups:</u>		
Name	Submitted by	Initials
United Arab Emirates	Abdulrahman Al Marzouqi	UAE
At-Large Advisory Committee	Matt Ashtiani	ALAC
<u>Individuals:</u>		
Name	Affiliation (if provided)	Initials
Tarik Merghani	ISOC Sudan	TM
John C Klensin		JCK
Section III: Summary of Comments		
<p><i>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).</i></p>		
<p>Four submissions were received during the public comment period on the Variant Issues Project – Arabic Case</p>		

Study Team Issues Report.

The first comment was made by Tarik Meghani of ISOC Sudan who cautioned against the use of ZWNJ in DNS and suggested using hyphen instead.

Another public comment submitted by Abdulrahman Al Marzouqi on behalf of the Telecom Regulatory Authority (TRA) of United Arab Emirates (UAE) government. It opposed the use of ZWNJ in TLDs because of confusion and complex problems it may cause. The same contribution emphasized the importance of category 3 (Interchangeable Cases) listed under section 6 of the Arabic Issues Report (Character Variants in Arabic Script). The comment suggested adding YEH and ALEF MAKSURA cases to the list provided in the report.

The third public comment was submitted by John C Klensin (JCK) who noted that large variant label sets (sets with too many variants) may be problematic unless they are used to block registrations. Another suggestion by JCK was to separate the visual confusion issues from the variant issues. JCK made a general remark cautioning against the notion of trying to solve all variant issues at the DNS level. He suggested that solutions could be made at the user interface (e.g., IRI) level, and used an example from the Arabic script that use labels with bidirectional text (bidi), which may need new rendering rules specialized to IRIs. JCK also flagged out that permitting the use of one or more characters from what Unicode characterizes as the “Common” and/or “Inherited” scripts, along with characters identified with the relevant scripts, would violate the existing ICANN principle prohibiting labels that contain characters from more than one script; and suggested use of such characters should require more rules.

Last public comment received by ICANN’s At-Large Advisory Committee (ALAC). ALAC’s contribution recognized the importance of IDNs in enhancing diversity and democratizing access, and recommended that for the 2012-2015 Strategic Plan, the ICANN Board should set aside financial and technical resources needed for IDN outreach. Similar to JCK, ALAC suggested identifying issues that should be handled as IDN variant issues versus issues that should be handled by other confusion avoidance mechanisms. ALAC also suggested that VIP case study teams should identify the readiness of implementation of IDN variants, and the level of consensus within each language community in order not to disadvantage those who are ready to implement.

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 Arabic case study team thanks the community for their thoughtful comments and provides the following analysis for them, and continues to look for further guidance from the community.

On the ZWNJ issue, the team’s report provides an exhaustive list of advantages and disadvantages as the team was not able to reach a consensus on whether ZWNJ should be allowed and looks forward to further discussions for the final solution. The comments raised have already been identified in the current analysis. However, if there is a certain issue which has been missed, e.g. ZWNJ and bidi related problems, the community is requested to provide specific cases to verify such issues. The team will continue to analyze both the needs and challenges to ZWNJ as it moves forward. The team realizes that there may be a need to

segregate these into linguistic versus technical issues for further discussion to help reach a decision in the 'solutions' phase.

The team welcomes and supports the suggestion of adding YEH and ALEF MAKSURA cases to the list of Interchangeable Cases and will take it into account.

On the issue of separating variant issues from confusable similar issues, team recognizes that the report has not distinguished between the two cases as the team has considered that both cases lead to variants (with different statuses). However, the team takes a note of this point, and believes that it is worth further discussion in order to reach consensus on whether this distinction should be explicitly made for the Arabic script case.

Regarding the comment made on long lists of variants and potential problems they may cause, the team will look into relevant linguistic and technical aspects and see if there could be further recommendations on this. Separating variants from confusable cases may have some impact, but there may also be a need for putting criteria that help set a practical limit to what can be allocated from a variant label set. As this aspect is not just limited to Arabic script, and setting practical limits is a procedural (and not a linguistic) issue, the team looks towards the community to devise further policy that could be considered to keep list of activated variants to a manageable length.

The team notes that it can conclude currently unresolved issues in its report if given more time for discussion with a few more Arabic script experts and with support from experts in the IDN VIP team. This work should be given priority to synchronize with the timeline of the gTLD program, to address the concerns raised by ALAC and JCK.

To enable this and other work around IDN variants, the team endorses ALAC comment that ICANN should allocate sufficient budget to complete these tasks in a timely manner. The team looks forward to ICANN's active support of this discussion until script level solutions for Arabic case study variant issues are finalized and published.

The team notes the concern that not all issues, e.g. bidi, are related to DNS (as DNS is agnostic to interface and processes string in key press order). The team appreciates and agrees with the comment that not all these issues are to be solved at the DNS layer. However the team has raised these concerns, as they are still important and relevant for users and need to be addressed by relevant parties in the context of variants, at operating system and application layers.

JCK raises another issue around the use of "Common" and/or "Inherited" characters, which is talking about the using Unicode characters' properties to define the scripts. Separately from the discussion on security and stability concerns, the team agrees with the concern that using such characters with these properties may indeed require defining additional rules. However, the team suggests the need to find a solution. The 'hyphen-minus' is one character that falls under this category and has been identified in the issue report and may require rules for usage, as suggested in the comment. ZWNJ, a CONTEXTJ character, will also require additional rules, as identified in the report). There are also some combining marks in Arabic script block with such a property, but the report recommends that they are not used for TLDs.