

20 March 2013

About APTLD

APTLD (Asia Pacific Top Level Domain Association) represents the interests of country code Top Level Domain (ccTLD) registries in the Asia Pacific region. APTLD was originally established in 1998 and was legally incorporated in Malaysia in 2003.

APTLD is a forum for information exchange on technological and operational issues between domain name registries in the Asia Pacific region. It also acts as an interface with other international Internet coordinating bodies, fostering the participation of AP ccTLDs in these global fora and acting in the best interest of APTLD members in global Internet policy-making processes.

Further information about APTLD can be found here: <http://aptld.org>.

Introduction

APTLD welcomes the opportunity to comment on the Interim Report-IDN ccNSO Policy Development Process and would like to thank IDN ccNSO PDP Working Group 1 and 2 for their dedicated effort in proposing recommendations for overall policy for the selection of IDN country code Top Level Domains strings (IDN ccTLD's) and the inclusion of IDN ccTLD managers in the ccNSO. We note that the Final Report of the IDN ccPDP is scheduled to put to the vote by Council and members and the next steps to be discussed on 9 April 2013, during ccNSO members meeting in Beijing, China as per the draft agenda: <https://ccnso.icann.org/meetings/beijing/agenda.htm>. APTLD has consulted members' view on the issues via its mailing list and this paper contains the consolidated comments of our members.

APTLD's comments on the Interim Report

1. The policy recommendations on IDN ccTLD String Selection Criteria, Requirements and Processes include a number of refinements to the existing IDN ccTLD fast-track processes, and elaboration on a number of areas such as the independent reviews by the Technical Panel and String Similarity Panel. We believe the recommendations are on the right track and welcome the adoption of them. The following are just a number of comments of a less critical nature which we hope will be beneficial for the preparation of the Final Report.
2. On p. 11, we noted that section J. "Variants" serves as a placeholder and there are no policy recommendations on handling and management of variant IDN ccTLDs because issues related to variant TLDs are still under discussion by the community. At the same time, we noted that the Issue Manager expected to formally publish the Final Report by the end of March 2013. APTLD would like to clarify if the IDN ccNSO PDP will not be concluded and its Final Report be published until the ICANN policies related to variant TLDs are finalised. A clarification on the dependency of the targeted conclusion date of the IDN ccNSO PDP on the finalisation of policies on handling variant TLDs would be helpful. Furthermore, we would like to ask if the experience gained by the processing of IDN ccTLD fast-track applications involving variant ccTLDs be incorporated into the said PDP.
3. Also on p. 11, the report mentions that a selected IDN ccTLD should not be confusingly similar with "reserved names". We would like to clarify if by "reserved names" the report refers to Special Use Domains registered by IANA (<http://www.iana.org/domains/special>). If that is the case, we suggest adding a reference to this specific term on the Final Report.
4. On p. 18 and p. 19, there is a disparity in the level of details of description for "Process for Technical Evaluation" and "Process for confusing similarity validation". The description for the latter process is more elaborated and complete. For instance, the time frame for conducting the

APTLD

string similarity review has been stated (30 days) but the same cannot be found for the technical review. Similarly, it will be more informative and complete if the target time for completing the Extended Process Similarity Review can be provided.

5. On p. 22, we suspect the title for recommendation D should read “Transitional arrangement for the Fast Track IDN ccTLD process”.
6. We do not see major issues with the policy recommendations on the Inclusion of IDN ccTLD in the ccNSO. The only comment is that more time should be allowed for voting by the Emissaries as they may need time to obtain consensus of the ccTLD and IDN ccTLDs within the Territory.

Collectively as one of the major stakeholders of the Internationalised Domain Name, APTLD in principle supports the Interim Report, subject to the above points of clarification and suggested improvements, and would like to see the publication of the Final Report of the IDN ccNSO PDP soon, for the overall benefit of the community. APTLD would like to reiterate our gratitude to the IDN ccNSO PDP Working Group 1 and 2 and ICANN supporting staff for their tremendous effort spent on the well thought out policy recommendations and drafting of the comprehensive reports.

Jian Zhang
General Manager
Asia Pacific Top Level Domain Association (APTLD)