**Comments to “Interim Report from the Expert WG on IRD”**

Verisign welcomes the interim report and the efforts to internationalized registration data. It notes, however, that the interim report recommends requirements to support transliteration or translation of contact information that we believe is outside the scope of the working group.

Specifically, there are four points we would like the working group consider:

* Address of registrant, technical and administrative contact
	+ Verisign is supportive of Proposal 3, Free form text.
	+ Rationale: If the objective is to allow the registrant to provide the postal information in the language of his/her choice, then unrestricted UTF-8, already a standard with these fields per RFC 5733, is the best choice for all address fields.
* Language tag (section 5.2)
	+ Language tags are not supported in RFC 5733 or in the current WHOIS standard and it is not clear how a language tag would support the localization of registration data. We recommend removing this requirement.
* Email addresses
	+ Verisign currently supports RFC5322 for email addresses (i.e., ASCII only). This is to ensure there is a valid and reliable email address to contact Registrars.
	+ The EAI standard is not widely adopted by email clients and servers, therefore internationalized email addresses are not a reliable contact method at this point.
	+ Verisign is supportive of the deployment of IDNs and EAI and will provide support to EAI when appropriate. We recommend that any support to EAI is made optional until support to EAI is widely adopted.
* Data labels
	+ The example on page 10 suggests that data labels ought to be translated as well. Data labels should be constant values in WHOIS to support a variety of clients that may localize them if needed.
	+ We recommend removing the localized data labels to avoid confusion.