

Comments on IDN Variant TLDs – LGR Procedure Implementation – Maximal Starting Repertoire Version 1 by Hong Kong Internet Registration Corporation Limited (HKIRC)

Hong Kong Internet Registration Corporation Limited (HKIRC), the registry of the .hk ccTLD and the .香港 (Chinese characters for Hong Kong) IDN ccTLD, submits the following comments on IDN Variant TLDs – LGR Procedure Implementation – Maximal Starting Repertoire Version 1 as announced on the ICANN public comment page:

<http://www.icann.org/en/news/public-comment/msr-03mar14-en.htm>.

HKIRC would like to thank the Integration Panel, Advisors, and ICANN staff for the effort in developing the Maximal Starting Repertoire Version 1 (MSR-1) and the opportunity for community members to comment on this version of the MSR.

Inclusion of the full Hong Kong Supplementary Character Set (HKSCS) to MSR-1

HKIRC advocates the inclusion of the full Hong Kong Supplementary Character Set (HKSCS) to the MSR-1. Of the 5,009 Chinese characters from the current version of the HKSCS, there are 2,677 Chinese characters not yet included in the MSR-1. A significant number of the HKSCS characters are commonly used in Hong Kong, one of the major Chinese speaking communities in Asia.

HKIRC requests including the 2,677 missing HKSCS Chinese characters to the MSR-1 and a list of the characters in question is attached to this comment letter alongside with their respective Code Points for reference.

About HKSCS

The publication of the HKSCS is an initiative led by the Government of the Hong Kong Special Administrative Region (HKSAR), aiming at facilitating electronic communication and data exchange conducted in Chinese in Hong Kong. The current version of the 5,009 HKSCS characters includes characters used in proper names, Cantonese dialect (a *lingua franca* in the Guangdong Province, spoken by the majority population of Hong Kong, and by many overseas Chinese communities), and scientific terms. These characters are mainly proposed by HKSAR government departments, academic bodies, educational institutions and members of the public.

More information about the HKSCS can be found at the website of the Office of the Government Chief Information Officer of HKSAR:

http://www.ogcio.gov.hk/en/business/tech_promotion/ccli/hkscs.

HKIRC is in the application process of including all characters of the HKSCS to the Chinese Domain Name Language Table as developed by the Chinese Domain Name Consortium (CDNC, <http://www.cdnc.org>), a standard used by most of the domain name registries providing Chinese domain name registration service.

Rationale for the inclusion of the full HKSCS to MSR-1

According to the “Procedure to Develop and Maintain the Label Generation Rules for

the Root Zone in Respect of IDNA Labels” (Procedure), Integration Panel should create the maximal set of code points for the root zone, and the MSR-1 is the first deliverable to that ends. With reference to the principles in respect of individual Code Points exclusion as discussed in the document "Maximal Starting Repertoire – MSR-1-Overview and Rationale", HKIRC does not see any justification for excluding any characters of the HKSCS from the MSR-1. The inclusion of the full HKSCS also poses no risk to the DNS and implementations, as a significant number of characters from the HKSCS have been employed in electronic data exchange and Internet communications for years.

Many characters from the HKSCS are commonly used by the population of Hong Kong on a daily basis and they should be qualified as members of the set of characters used by modern living Chinese language.

With a population of more than seven millions and an Internet penetration rate of 70+%, Chinese characters commonly used in Hong Kong should not be excluded from the consideration of the ICANN root zone IDN label generation exercise.

As a result, the 2,677 missing HKSCS characters should be added to the MSR-1 for the Generation Panel’s further evaluation, according to the Procedure.

About HKIRC

Hong Kong Internet Registration Corporation Limited (HKIRC) is a non-profit-distributing and non-statutory corporation designated by the Government of the HKSAR to administer .hk and .香港 country-code Top Level Domains (ccTLDs). HKIRC is committed to serve the Internet community of Hong Kong and mandated to promote Hong Kong as an international centre for e-commerce and liaise with local and international bodies on issues relating to the development and administration of the domain name system.