

Mrs. Naela Sarras
IANA
Internet Corporation for Assigned Names and Numbers

Diegem, 7 May 2012

Subject: Second Annual Review of the IDN ccTLD Fast Track process

Dear Mrs Sarras,

We would like to thank you for the opportunity to comment on the IDN ccTLD Fast Track process. We apologise as this communication is sent to you after the closing date of the public comment period.

We respectfully submit the following input to your attention. Our feedback is based on our experience with the Fast Track procedures as well as on the talks and meetings we had with IANA and ICANN staff, as well as with linguists.

First of all, we would like to underscore that in the assessment report we received for the Cyrillic string (.ею) and the Greek string (.ευ), the following sentences generated several concerns to us: *"Our assessment of "visually distinct" and "visually confusable" therefore accounts for both the individual features of each character and their combined effect when presented as a two-character string."* Later on in the text, it is stated *"However, as "confusability" is an intrinsically subjective assessment (...)"*.

As mentioned to ICANN staff on numerous occasions, EURid developed a series of scientific studies regarding "character confusingly similarity". Therefore, it is worth to highlight that if on one hand it is clear that the "confusability" element is linked to a subjective assessment, on the other it is well known that since 1950s neuroscientists produced many researches on characters perceptual ambiguities with valid conclusions. We do believe that the DNS Stability Panel should not only take into due account the past and present scientific analysis around this topic, but possibly include a neuroscientist among its members, who are unfortunately unknown. At the same time, because *"confusability" is an intrinsically subjective assessment"* – as stated in the DNS Stability Panel assessment – it is hard to honour the rejection of a proposed string by a group of people whose educational and cultural background is not shared with the community.

Secondly, we firmly believe that one of the core objectives of the Fast Track was and still should be the promotion of multilingualism online. The Fast Track was thought as a tool to facilitate the people to express themselves in their own language at the top level. We are aware of the need to have any assessment based on the ISO 646-BV list. However, we believe that there should be specific, procedural rules to provide certain communities with the opportunity to write and use their own TLD in their own language. The current rules prevent this option by allowing a proposed string to be rejected on the basis of a *possible* similarity with non-assigned ISO strings or non-used ISO strings. Therefore, we warmly recommend ICANN to find a proper solution to this kind of cases either by liaising with the International Organisation for Standardisation or by foreseeing clearer rules in the IDN Fast Track process.

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Finally, we would like to subscribe the point of view of many members of the TLD community for the introduction of an appeal process in the IDN ccTLD Fast Track Process. More precisely, we would like to support the input provided by the Hellenic Ministry of Infrastructure, Transport & Networks for an appeal panel that should take into account the applicant's objections and issue a further assessment where deemed necessary.

We would like to thank you once more for your assistance in the process and we remain confident in a positive outcome of the pending matters.

Yours Sincerely,



Marc Van Wesemael

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