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Afilias Comments on Proposed Implementation Details regarding Development and Use of IDN Tables and Character Variants for Second and Top Level Strings

Afilias is a global leader in advanced registry services and provides a wide range of capabilities essential to the smooth and efficient operation of any type of domain registry. Afilias supports a diverse group of Top Level domains, including .INFO, .ORG, .AERO, .MOBI, .ASIA, .AG (Antigua and Barbuda), BZ (Belize), GI (Gibraltar), HN (Honduras), IN (India), LC (St. Lucia), ME (Montenegro), MN (Mongolia), SC (the Seychelles), and VC (St. Vincent and the Grenadines).

Afilias welcomes the opportunity to comment upon the proposed implementation details regarding development and use of IDN Tables, as referenced at <http://www.icann.org/en/topics/idn/fast-track/proposed-implementation-details-idn-tables-18feb09-en.pdf>.

Comments:

Variant characters are defined on page 1 as “two or more characters that have “the same meaning” when used in domain name registrations.” Elsewhere (page 3) variants are defined as “having orthographic equivalence.”

1. We believe that variants are two or more characters which are visually confusable, share a similar shape or are orthographically equivalent. Examples of variants would be, for example, ‘æ’ (U+00E6) and ‘ae’ in English, ‘ஐ’ (U+0BB5) in Tamil and ‘ഐ’ (U+0D16) in Malayalam, or ‘آ’ (U+064A) in Arabic and ‘آء’ (U+06CC) in Persian.
2. We suggest that the definition of variants be updated to reflect linguistic and orthographic accuracy.

Afilias believes that more precision is required in the definition of IDN Tables. IDN Tables are defined as (page 3) containing characters that either represent a specific language, or are taken from a particular script without particular reference to any of the languages that are written with it.

1. The rationale for combining all prior IDN table definitions (language tables, variant tables, script tables, etc) is not explained in the document.
2. It is not clear whether existing “language tables” or other forms in the IANA database will remain reference documents, or will be retired in favor of the new IDN Table structure. Afilias references the IANA IDN Repository extensively in our FAQs and communications with registrars, so a possible deprecation must be announced with sufficient advance notice.
3. The definition does not appear to accommodate languages that use multiple scripts and which might be defined in a single IDN Table.
4. We expect that if a TLD operator were to submit an IDN table without specifying the language(s) for domain name registrations, all domain name registrations will require a language classification (aka “language-tag”).

The development of the appropriate character set and its variants (Page 4) uses an example that refers to a “speech community”. We believe this is in error and should be replaced by “language/script community.”

We believe that Language tables must always be accompanied by a Variant Table. In cases where no variants exist, this should be stated. In cases where a registry operator submits more than one IDN Table for the same TLD application, clarification on intended use of each table will help other registry operators who plan to follow local authoritative usage practice.

We concur that the number of strings should be expanded to allow various countries and territories to have their variant string(s) allocated. [Page 7].

Variant strings are required to be supported by a statement by an authority in the country or territory. This same authority is also required to attest that the proposed TLD label would not conflict with another TLD label representing another language. It is likely that such attestation about conflicts in other languages may need to be issued by authorities in those languages or in other territories who are not the signatory of the support statement. It may be wise for ICANN to retain some flexibility in this area.

As the leading gTLD and ccTLD registry services provider, Afilias is concerned about a proliferation of IDN Tables with loose definitions and unsubstantiated linguistic claims for the same set of languages and/or scripts. This could lead to unnecessary duplication of effort and would place registry operators in the untenable position of having to “pick sides” regarding which table to use. ICANN should set a high bar for the acceptance of IDN tables, and ICANN must ensure that some documentary evidence of consultation with the appropriate linguistic community(ies) is provided when submitting IDN Tables.

Afilias looks forward to continued co-operation in the area of IDN TLD deployment.

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