# Arabic Script IDN Working Group (ASIWG)



#### Arabic Script Internationalized Domain Names Working Group (ASIWG)

## ASIWG RESPONSE TO ICANN ON ICANN IDN PROPOSED DEVELOPMENT AND USE OF IDN TABLES AMMAN, JORDAN, 3 APRIL 2009

## Introduction

The Arabic Script Internationalized Domain Names Working Group (ASIWG) is pleased that ICANN has requested public comments on its document titled "ICANN IDN Proposed Development and Use of IDN Tables."

The ASIWG met in person in Amman, Jordan during April 1-3, 2009. During the course of this meeting, ASIWG members reviewed the above referenced document. Our coordinated response to the ICANN document on IDN Tables is enclosed below.

## Comments

- 1. ASIWG supports ICANN's recommendation for collaboration among language communities sharing the same language/script for development of IDN tables. ASIWG recommends defining a clear process for the submission of these tables to ICANN.
- 2. ICANN should create appropriate criteria for accepting IDN Tables. ASIWG believes that due diligence must be performed prior to accepting IDN Tables. This includes, for instance, tasks such as (but not limited to):
  - Solicitation of relevant community feedback
  - Consultation with relevant prior work

so as to ensure that duplicative effort is reduced and confusion avoided.

- 3. ASIWG believes that completeness of tables should be a <u>requirement</u> prior to acceptance of IDN Tables. More details are provided later in this document.
- 4. ASIWG recommends that IDN table submissions should contain two parts, one part which includes the characters which are allowed for the language/script community within the relevant script block, and the second part which includes the relevant variant table(s). In case there are no variants, the submitter must affirmatively state so. This ensures that the submitting party has taken due care in examining the language(s) they plan to implement with respect to variant issues.

- ICANN should allow TLD Registries to adopt tables that are agreed upon by language/script community-based expert groups or other competent authorities. ASIWG encourages such groups to publish their tables in well known, open forums such as the IETF. Preference should be given to such documents.
- 6. ICANN should encourage TLD Registries to refer to already accepted IDN tables prior to submitting new IDN tables for the same language/script/community.
- 7. ASIWG suggests that ICANN review IDN table submissions for the same language/script/community with earlier accepted IDN tables by other TLDs, and require that where variations exist, the rationale and the variations be documented.
- 8. ASIWG recommends that ICANN publish its repository of IDN tables and make them publicly available for other TLD registries for possible re-use (if needed).
- 9. TLD Registries should be allowed to submit more than one IDN table to serve different language/script communities.
- 10. ASIWG recommends that ICANN delineate the new IDN table submissions from existing language and variant table submissions for purposes of clarity.
- 11. ICANN should expand its role to document the process regarding the development of IDN Tables, and publish guidelines for IDN Table development.
- 12. IDN tables needed by language/script communities should be <u>complete</u> (i.e. the table should not have either a smaller or a larger set of characters than required by the community). Submissions of IDN Tables to ICANN should document this aspect of IDN Table completeness. ASIWG is concerned that IDN Table submissions that are either partially complete or adds excessive characters, if accepted, may open the door for bad faith registrations.
- 13. The definition of variant characters in the current document must be modified. ASIWG believes that variant characters are "two or more characters that are visually confusing when used in domain name registrations." ASIWG encourages ICANN to <u>not</u> use the term "the same meaning" to define variants because it connotes semantic similarity rather than shape similarity. Additionally, Orthographic equivalence is not accurate in describing variants as it limits them only to identical characters.
- 14. It is important to specify the distinction between the various kinds of IDN tables. This is particularly significant since we anticipate that new IDN Table submissions and/or new TLD applications will refer to existing tables, and a specific reference rather than a generic table will be more meaningful. For instance, "IDN Table from Pakistan" is not as useful as "IDN Table from Pakistan, with Language Table for Urdu and relevant Variants".

- ASIWG believes there at least five categories of IDN Tables: Language Table, Script Table, Multi-Language Table, Multi-Script Single-Language Table and Multi-Script Multi-Language table. These categories will need to be defined. ASIWG is working on these definitions and is willing to share this to ICANN once complete.
- 15. ASIWG supports ICANN's proposal that variant strings be either allocated or blocked for registration for the same applicant, following the logical arguments and requirements set forth in the ICANN IDN Table document. However, we suggest that the variant name(s) applied for should be <u>allocated</u> by default, unless it can be clearly demonstrated that activating the variant form would cause unavoidable confusion. For at least two countries (Iran and Pakistan), variants are needed for expressing the country name as the TLD.
  - A request for <.iran> (in Persian) will use the Persian 'YEH (U+06CC)'. However the Arabic 'YEH (U+064A)' will produce a string that looks identical to the Persian one, and may well be used by someone using an Arabic keyboard.
  - Similarly, < .pakistan> (in Urdu) would use the Persian 'KAF' (U+06A9), but will look identical if written using the Arabic 'KAF' (U+0643) (پاکستان. vs. پاکستان).

Allocating variants to the same applicant and requiring the applicant to take steps to avoid user confusion (such as aliasing) is the safe and prudent course of action.

#### Summary

ASIWG appreciates the opportunity to contribute towards the internationalization of the global domain name system. We look forward to the opportunity to co-operate with ICANN, international organizations and language and script communities worldwide towards the safe and orderly creation of domain names using the Arabic script.

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