Comments and Feedback

By the Government of Egypt

On the Draft Implementation Plan for IDN ccTLD Fast Track Process

In some sections it is not clearly stated that support or approval of the government is a condition. This needs to be explicitly mentioned, especially in the below listed sections.

Pages 6 – Section 2.2:

"In such a case proof of support and approval from the country or territory corresponding to the relevant ISO 3166-1 entry must be provided"

o Government support and approval should be explicitly mentioned.

Pages 15 – Section 5.1.1:

"1. Support from the country or territory that the selected string is a meaningful representation of the country or territory name."

"2. Support from the country or territory for the selected registry operator."

o Government support should be explicitly mentioned.

Pages 25 – Section 6.1.4:

"1.7 The prospective manager has the requisite authority to operate the TLD appropriately, with the desire of the government taken very seriously."

o Government approval should be an explicitly mentioned condition.

Re-phrasing to clarify that each country or territory may be delegated one string in each script representing each official language.

Pages 8 – Section 3.3:

"One string per official language or script per country or territory"

o The word 'or' is a bit confusing. It's more clear if the wording is changed to:

"One string in each script used to represent each official language per country or territory"

There should be at least one correspondence/communication between the Technical Committee and the IDN ccTLD requestor before refusing a string.

Pages 13, 20, 23:

o If a proposed string is to be refused by the technical committee, it is important that the committee shares its concern(s) with the requestor before doing so, to make sure that the committee and the requestor, both, have common understanding of the problem. Furthermore, in such a learning phase, the committee may receive additional information from the requestor that further clarifies the problem or proposes a solution to it.

o This should also be reflected in the flow chart in page 23.

Agreements between ICANN and IDN ccTLD operator should not be made a condition for IDN ccTLDs delegation

Module 7 - Section 7.1: Relationship between ICANN and IDN ccTLD operator

o It is important to ensure ongoing compliance with the IDN technical standards, including IDNA protocol and IDN guidelines and operators must commit to technical compliance from a pure technical point of view.

o IDN ccTLD operators may be encouraged to sign framework agreement with ICANN yet, same as with ASCII ccTLDs, agreements should be kept voluntary and should not be made a condition for IDN ccTLDs delegation.

o Posting of a template of such an agreement may guide the decision of IDN ccTLD operator.

o Government support should be sought before entering into such agreements.

Financial Contributions should not be made mandatory.

Module 7 - Section 7.2: Financial Contributions

o Mandatory financial contributions will be a burden, especially for developing countries. Thus in a trial to solve the language barrier, a cost barrier would be introduced.

o Governments, especially of developing countries, have developmental objectives that should be facilitated by the introduction of IDN ccTLDs and may be hindered by financial obligations.

Input on contention Issues with the Existing TLDs and new gTLD Applications.

Module 7 - Section 7.4: Discussion of Contention Issues with the Existing TLDs and new gTLD Applications

o Normal mechanisms should be followed to ensure that a new IDN ccTLD string is not in conflict with an existing ccTLD or gTLD. Cross matching should take into consideration characters that are listed as variants to others.

o Rare cases, where an applied for gTLD is identical or confusingly similar to a requested ccTLD, may be detected by early coordination between both processes and the posting or publication of the new gTLDs and new ccTLDs if needed.

o IDN ccTLD strings do not have to be confidential and may be posted if this would help the process yet IDN ccTLDs should not be subject to a public objection procedure where everyone has to agree (or at least not to object) that a proposed string represents the country name. It should be considered sufficient that the string meets the following fast track requirements:

    o String approved by government, local community and ccTLD registry

    o String meets technical requirements

    o String meets language/script requirements

    o String meets meaningfulness requirements (country name, part of it or abbreviation)

o After meeting the above criteria, if conflict still exists, priority should be given to the IDN ccTLD string.

Registries should use language tables and not script tables.

Module 7 - Section 7.5: IDN Table Procedure

o A language table includes the code points of all characters used to represent a specific language. A script table includes all code points of all characters used in a specific script that may be used to represent one or more languages. A variant table includes cross reference of code points of a certain language with their variants (confusingly similar) across languages (whether or not from the same script).

o Although on the protocol level there may be no difference in dealing with different languages as far as they all belong to the same script family, yet users understand languages, speak languages and expect to register domain names in their own languages.

o Rules on script are mandated across registries while language rules are applied on registry-by-registry basis, i.e. it's a registry decision.

o A registry should not support a whole script table. Instead a registry supporting more than one language using the same script should support only the union of the character sets/ language tables representing the languages supported.

o Supporting a whole script table would only increase the possibility of security problems by allowing registration of characters that are not required by any of the

language communities. Script tables usually include legacy characters that are not currently used by any language and whose characteristics and variants are not known.

o IANA should separate 2 different categories of IDN tables: language tables and script tables.

o Language communities using the same script should be encouraged to cooperatively work out their respective script tables and variant tables.

o Registries should be encouraged to make use of language tables already defined already defined by other registries of language communities.

Annual review would help fine tune the process.

Module 7 - Section 7.6: Proposed Evaluation of Fast Track the Process

o Conducting an annual review as proposed would help fine tune the fast track process, yet this should not delay the finalization of the full PDP process.