

auDA comments on IDN ccTLD Fast Track Proposed Solutions

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.au Domain Administration Ltd (auDA) is the not-for-profit organisation endorsed by the Australian Government to administer the .au domain space under an industry self-regulatory regime. auDA is a long-standing, active participant in ICANN's country code Names Supporting Organization (ccNSO).

auDA welcomes the opportunity to comment upon the second iteration of ICANN's IDN ccTLD fast track process implementation plan and supporting documents.

Comments

The introduction of internationalised domain names represents one of the most significant developments in the history of the internet, allowing potentially billions of users to interact online in their native languages and scripts. As such, it is appropriate for ICANN to follow a robust, consultative, inclusive process in developing mechanisms and procedures for the introduction of IDNs.

However, the current "fast track" process has been developed to meet proven, immediate demand for non-Latin ccTLDs. Therefore, ICANN should work expeditiously with relevant stakeholders in order to finalise policy arrangements and launch IDN ccTLDs by its annual meeting in Seoul in October 2009.

In general, the current draft of the Fast Track Process Implementation Plan provides an appropriate framework for the introduction of IDN ccTLDs. In order to meet the timeframes identified above, ICANN staff should endeavour to finalise outstanding details, including information on "meaningfulness" requirements, and the finalised structure and role of the DNS Stability Technical Panel.

auDA recognises the desirability of agreements between ICANN and IDN ccTLD managers. Such agreements should be encouraged as they facilitate the mutual recognition of each party's roles and responsibilities and document their commitment to the ongoing security and stability of the internet.

The draft "Documentation of Responsibilities" and ICANN's current Accountability Framework program for ASCII ccTLDs, upon which the D-o-R is based, provide an appropriate template for ICANN-IDN ccTLD agreements.

However, the failure of ICANN and an IDN ccTLD manager to enter into a formal documented relationship should not prevent the delegation of the relevant IDN ccTLD.

Similarly, auDA recognises the need for ICANN – as a not-for-profit body – to recover costs associated with the introduction of IDN ccTLDs. As such, it is appropriate for IDN ccTLD managers to make financial contributions towards ICANN's operations.

However, it is impossible to develop a reasonable model for contributions until all stakeholders possess a clear understanding of the costs involved with the IDN ccTLD Fast Track programme. As such, auDA supports the ccNSO Council's call – most recently stated on 4 March 2009 - for ICANN staff to provide:

- a breakdown of the costs involved in introducing IDN ccTLDs;
- detail on other costs ICANN incurs in relation to ccTLDs; and
- concrete proposals on possible financial contribution models based on these costs.

While it is appropriate for IDN ccTLD managers to make financial contributions, these should not be made mandatory and the absence of such contributions should not prevent the delegation of the relevant IDN ccTLD.

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