

Comments on the IDN ccTLD Implementation Draft Plan . Revision 3.

We would to express our appreciation and support to ICANN's work in IDN ccTLD Fast Track initiative, and we looking forward for its implementation phases, ICANN should work toward implementing IDN ccTLD Fast track within the published time line.

We appreciate the release of IDN ccTLD Implementation Plan Draft revision 3. With its supporting documents, we would like to provide our comments to some of the issues raised:

○ **Documents of Responsibilities "DoR" :**

- The future IDN ccTLD registries should be treated as the current ASCII ccTLD registries, in terms of IANA delegation process and relation with ICANN.
- IDN ccTLD Delegation Process should not mandate new IDN ccTLD requestor to sign an agreement with ICANN for the delegation of the IDN ccTLD.
- We support any form of a light-weight commitment arrangements between ICANN and the new IDN ccTLD requestor, this should be based upon ensuring the security and stability of the internet, compliance with IDNA protocol and IDN guidelines.

○ **Fees and Costs :**

- We think that the IDN ccTLD implementation costs (e.g Application processing fee, ..etc) will be an entry barrier for developing countries and Countries applying for more than one IDN ccTLD string, or Countries planning to provide IDN ccTLD for no-profit purposes .
- ICANN responsibility to bring multilingualism to the internet addressing system should not be ignored; using a financial costs recovery approach should not be the only objective when considering the costs associated with IDN ccTLD implementation.
- The IDN ccTLD and Linguistic communities has been working for many years developing IDN policies and implemting technical solutions, this effort and its costs should be acknowledged and considered.

○ **Variants and Language Tables :**

- Variants are a critical issue that need an agreed solution as soon as possible between ICANN and Communities interested in using/allowing variants like the Arabic and Chinese Community .
- We think that changes need to be done to IANA language and variants tables repository, Language communities using the same script should be encouraged to develop and publish agreed upon IDN Tables easily and be available for re-usability .

○ **Implementation Time Frame :**

The IDN ccTLD implementation time plan should not be changed or delayed to accommodate the ongoing revisions in the IDNA protocol, or for any other pending issues that could be solved by a policy development process, ICANN should work toward implementing IDN ccTLD according to its published time frames .