

Egypt Comments on
Proposed Development and Use of IDN Tables and Character Variants
Document

Egypt appreciates the opportunity offered by ICANN to comment on the document "Proposed Development and Use of IDN Tables" and recommends the following:

- As the document refers only to IDN tables and reference to the following statement:

"The term "IDN Table" as it is used here, corresponds to what in previous contexts was referred to as a "variant table", a "language variant table", a "language table" or a "script table"."

Egypt recommends that ICANN have clear definitions and distinction between the different categories of IDN tables and that ICANN maintain a categorized repository of IDN tables.

- Egypt supports the following statement:

"It is strongly recommended that there be collaboration among communities sharing scripts, or where particular confusability exists between characters across the used languages, to develop IDN tables and associated policies.";

and recommends that ICANN establish a clear process for submission of language/script tables developed by language communities sharing the same language/script.

- Egypt recommends that ICANN establish criteria for submission of the different categories of IDN tables and have a unified format for submission of each category, where a registry should submit a variant table, along with the supported language table, listing all visually confusing characters, if any.
- A registry should be referred to an existing language table prior to submitting a new one for the same language. In case a new table is still needed, ICANN should document the reason and the variation between both tables for future referencing.

- In reference to the following statement:

"An IDN table will typically contain characters that either represent specific language, or are taken from a specific script without any particular reference to any of the languages that are written with it."

Egypt recommends that an IDN table contain only complete sets of characters of supported languages. Having less characters would not serve the relevant language community needs and having more characters, that do not belong to any of the supported languages, may increase bad faith registrations and pose security threats.

- It is worth noting that some characters within a script table might not be advisable for domain name registrations as per the relevant language community's request, such as diacritics in case of Arabic script. Diacritics are part of the language and should not be protocol disallowed yet the security risk of their implementation are by far more than their need as they are not used by the language community in normal day-to-day communication. Hence there should be a mechanism to ensure that such recommendations are respected and followed by the registries.
- Egypt welcomes ICANN's response to community needs, and supports its 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 document.