Comments and Feedback
On the Draft Implementation Plan for IDN ccTLD Fast Track Process

By the SaudiNIC (.sa ccTLD registry)

SaudiNIC sees the delegation of IDN ccTLDs in the same light as existing ccTLDs – they are for the local communities to operate for their own communities use. The only significant difference is that the IDN ccTLD provides a facility for local users to completely use the Internet in their own language. Otherwise, we see no change in the status quo relationship from the existing ccTLDs.

The Draft IDN ccTLD Fast Track Implementation Plan raises additional topics for discussion. The following are our responses to some of them.

1. GOVERNMENTS SUPPORT AND APPROVAL

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"

- 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."

- 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."

- Government approval should be an explicitly mentioned condition.

2. RELATIONSHIP BETWEEN ICANN AND THE IDN CCTLD OPERATOR

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

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

- A voluntary, documented relationship is available between the IDN ccTLD Operator and ICANN – just as it is available to existing ccTLDs. This could take the form of a contract, an accountability framework, an exchange of letters or some other vehicle deemed appropriate by ICANN and the ccTLD Manager.

- For those operators who, for whatever reason, do not want to exchange documents with ICANN, a commitment to the stability and security of the Internet, including compliance with the IDNA Guidelines and Protocols, should be sufficient.

3. FINANCIAL CONTRIBUTIONS
Module 7 - Section 7.2: Financial Contributions

Financial Contributions should not be made mandatory.
- As indicated above, we see no difference between the existing ccTLDs and the new IDN ccTLDs.

- 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.

- 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.

- The operators of the new IDN ccTLDs can make a voluntary contribution or may enter into a more structured mechanism for financial contributions to support ICANN and its work.

4. 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

- 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.

- We also note the previous recommendation from both the GAC and the ccNSO that new gTLDs should NOT represent the names of countries or territories listed in the ISO 3166 list. We continue to support this.

- We continue to support the rights of nations and territories to use the Internet to establish their own 'space' on the Internet.

5. IDN TABLES.
Module 7 - Section 7.5: IDN Table Procedure

Registries should use language tables and not script tables.
- 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).

- 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.

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

- 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.

- 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.

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

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

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