



FÉDÉRATION INTERNATIONALE DES CONSEILS
EN PROPRIÉTÉ INTELLECTUELLE

INTERNATIONAL FEDERATION OF
INTELLECTUAL PROPERTY ATTORNEYS

INTERNATIONALE FÖDERATION
VON PATENTANWÄLTEN

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9 April 2014

PDP Working Group
ICANN

via email: gns0-secs@icann.org

cc via email: gns0.secretariat@gns0.icann.org

RE \ \ FICPI comments on the Translation and Transliteration of Contact Information PDP Working Group Questionnaire

Dear Sirs

I have pleasure in submitting FICPI's comments on the above mentioned report.

Yours faithfully,

Julian Crump
FICPI Secretary General

Enc.



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FICPI Comments on the Translation and Transliteration of Contact Information PDP Working Group Questionnaire

FICPI, the International Federation of Intellectual Property Attorneys, broadly representative of the free profession of more than 86 countries/regions world-wide, herewith comment on the Translation and Transliteration of Contact Information PDP Working Group Questionnaire:

Question:

Whether it is desirable to translate contact information to a single common language or transliterate contact information to a single common script.

FICPI view:

WHOIS information should be globally available. From a legal point of view, it is important that the address and further contact information can be recorded and readable both in each local language of the holder, as well as translated or transliterated to a single common language that can be easily readable and searchable internationally.

Question:

What exactly the benefits to the community are of translating and/or transliterating contact information, especially in light of the costs that may be connected to translation and/or transliteration?

FICPI view:

Internet is a global communication system, and it is important that the WHOIS information is safe, correct and globally readable. Without a clear and general translation and/or transliteration of contact information, the WHOIS record system will fail.

Question:

Should translation and/or transliteration of contact information be mandatory for all gTLDs?

FICPI view:

Yes.



Question:

Should translation and/or transliteration of contact information be mandatory for all registrants or only those based in certain countries and/or using specific non-ASCII scripts?

FICPI view:

Translation and/or transliteration of contact information should be mandatory for all registrants, which may also solve some problems in the ASCII WHOIS system related to a country with only a few national letters that does not fit in to this system today.

Question:

What impact will translation/transliteration of contact information have on the WHOIS validation as set out under the 2013 Registrar Accreditation Agreement?

FICPI view:

It is necessary to keep the WHOIS validation system workable on an international base.

Question:

When should any new policy relating to translation and transliteration of contact information come into effect?

FICPI view:

As soon as possible, and at least within the next 12 months.

Question:

Who should decide who should bear the burden translating contact information to a single common language or transliterating contact information to a single common script? This question relates to the concern expressed by the Internationalized Registration Data Working Group (IRD-WG) in its report that there are costs associated with providing translation and transliteration of contact information. For example, if a policy development process (PDP) determined that the registrar must translate or transliterate contact information; this policy would place a cost burden on the registrar.

FICPI view:

The burden will have to be divided in between the registrants and the registrar.



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Question:

Who does your SG/C believe should bear the cost, bearing in mind, however, the limits in scope set in the Initial Report on this issue?

FICPI view:

The cost should be divided between registries and registrars.

[End of document]