

**Translation and Transliteration of Contact Information PDP Working Group**  
**05 May 2014**

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For complete overview of comments received, please see <https://community.icann.org/display/tatcipdp/13+Community+Input>

#	Comment	Who / Where	WG Response	Recommended Action
<b>Issue #1:</b> Whether it is desirable to translate contact information to a single common language or transliterate contact information to a single common script				
1.	English, however, is the 'de facto' [language] for intercultural communication and international business transactions including the internet. Therefore, It is quite clear that it is desirable to translate contact information to a single common language or transliterate contact information to a single common script and preferable in English.	Thai GAC Representative		
2.	Registrants should be given the opportunity to submit data to the Registrar in their own language when registering a domain name.	European Commission		
3.	In principle, translating contact information to a single language privileges the users of that language over other users, just as the transliteration to a single script privileges users of that particular script over others. The choice of one single language or script does not reflect or support a global Internet community, which is diverse in language and script use. Ideally, registration contact information should be available in languages and scripts that reflect the global diversity of Internet users. We recognize that the current WHOIS implementation is based on a limited 7-bit ASCII that cannot properly render many languages and scripts. We are also aware that once the IETF completes its work on the <i>Web Extensible Internet Registration</i>	ALAC (Please note for ALAC's comments: The use of the word "transformation" of contact information pertains to the "translation		

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	<p><i>Data Service (WEIRDS)</i>, a WHOIS database that can handle multiple scripts and character sets will be available. Irrespective of whether contact information is transformed or not, we strongly believe that verifiable and verified contact information must be accessible to those with a right and need to access it via the WHOIS database. The availability of contact information that is validated for accuracy and usability promotes consumer trust in the Domain Name System and is beneficial to the At-Large community.</p> <p>Until a fully internationalized WHOIS is available, ensuring that registrations created using non-ASCII-based scripts have meaningful and usable contact information in the current ASCII WHOIS can be achieved in various ways:</p> <p>One option is to transform the contact information into a single language or specific set of languages using scripts that are representable within the constraints of the current WHOIS. Another option is to have the ASCII-based WHOIS record point to a non-ASCII based record, which would be maintained by the Registry and in parallel with the ASCII WHOIS.</p> <p>When considering the transformation of contact information (i.e., whether to translate or transliterate), transformation to a level where it is understandable to users of registration data may require a combination of both translation and transliteration. For example, when transforming contact information, proper names or nouns (i.e., unique names of persons, places, events and things) should not be translated and should instead be transliterated. Translation and / or transliteration may thus be appropriate for specific parts of WHOIS as identified in the Issue Report.</p>	and / or transliteration" of contact info)		
4.	As the local WHOIS information is (or at least should) be	IPC		

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	registered in respect of each language / script related to the home country / address of each holder, it is also desirable and necessary to translate contact information to a single common language in order to keep the WHOIS information easily searchable and readable for all global Internet users			
5.	It would be appropriate that the registration info(or contact info) in Chinese script is the basic requirement in the area of China.	Cui Shutian (PR China GAC Rep)		
6.	There is no justifiable reason to create a policy requiring translation and/or transliteration of contact information within the WHOIS/gTLD Registration Directory Services into a common language and/or script. The Internationalized Registration Data Working Group (IRD WG), in its final report, published some very substantive findings. Those included that it is both suitable to internationalize the data elements of domain name registration data (with the exception of the sponsoring registrar), and that it is suitable to introduce display specifications to address internationalized registration domain name registration data. These two functions would enable potential registrants whose native languages are not based on Latin script to register domain names (and internationalized domain names) using their native languages and script for registration data purposes. This option should be made available to registrants and should not affect the validation requirements of registrars as stipulated in the 2013 RAA. There is, however, no basis for any assumption that those registrants will benefit whatsoever from translation of their contact information to a single language or transliteration of their contact information to a single script. The parties that are	NCSG		

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	most likely to benefit from translation and transliteration of contact information (also pointed out in the IRD WG's final report) are intellectual property rights holders and law enforcement agencies.			
7.	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.	FICIP		
<b>Issue #2:</b> 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?				
8.	<p>As the result of using single official language system, most of the contact information used is in Thai and the translating and/or transliterating of contact information from Thai to English has been loosely handling by applicants or data owners. Several government entities handling English contact information by accepting the information given by data owners per se, therefore, it is possible that the English contact information is inconsistent.</p> <p>In other cases which government bodies need to provide English contact information such as the geographical name of a street. There are several related standards such as 'Romanization' by Royal Institute, 'the list of exception or reserved words' by geographical name committee. The result of adopting these standards appears in the list of geographical names for places in Thailand in UNGEGN (United Nations Group of Experts on</p>	Thai GAC Representative		

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	<p>Geographical Names). However, the standards are not widely known and it is not mandatory to adopt. Therefore, it is possible that each government entity could use different method for translation and/or transliteration.</p> <p>From the stated current condition, if the contact information needs validation, it could be a burden trying to figure out the suitable reference, if any. We have no objection with the approach from the Translation and Transliteration of Whois Contact Information DPD Working Group that this issue is tightly related to the role of government. Currently we are under the consideration to provide the infrastructure for translation and/or transliteration as the single registry system. This approach could benefit as in the most accurate reference for contact information in English and the validation could be handled at the most economic cost.</p>			
9.	<p>A homogeneous WHOIS (i.e. IRD) resource is quoted as a benefit of transliterating/translating. Using a common language facilitates registration when registrants do not share one. Consultation of data by law enforcement et al. requires a common language.</p> <p>Validation will be more cumbersome provided there is no translation or transliteration</p>	European Commission		
10.	<p>In the absence of transformation of contact information, non-ASCII represented scripts cannot be placed in the WHOIS record, which contravenes the Registrar Accreditation Agreement. Transformed contact information that is verified to be accurate</p>	ALAC		

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	<p>and useable allows users who can understand the information to see who are the domain name registration holders and how to contact/reach them.</p> <p>Contact information is used by a range of users for various purposes, which include regulatory/contract enforcement, domain name monitoring and research, domain name purchase/sale, individual Internet use, technical issue resolution, legal action, abuse mitigation and malicious Internet activities (see Expert Working Group on gTLD Directory Services Report).</p> <p>In cases where harmful Internet activities are perpetrated, the availability of contact information that is verified to be accurate and useable facilitates those taking action to protect end users.</p>			
11.	<p>Without a proper translation/transliteration of contact information, the WHOIS record system will lose its clarity, which may cause difficulties for the domain holders in confirming that they have updated and correct contact information, and may also cause unnecessary legal actions and/or alternative dispute resolution actions where the holder of the domain name could not be properly identified and contacted. In fact, the combination of contact information in both the holder's local language and one worldwide acceptable translation/transliteration should provide an adequate legal basis for sufficient identification of contact information in national legal actions as well in global domain dispute cases.</p>	IPC		
12.	<p>We believe that the benefits of translating and/or transliterating contact information to the community will be limited to end users seeking the contact information of domain name registrants. As mentioned in the IRD WG's final report, those are</p>	NCSG		

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	most likely to be intellectual property rights holders and law enforcement agencies, specifically IPR holders and LEAs using the English language and Latin based scripts. Since they are the beneficiaries of this service, the burden should fall on them to translate and/or transliterate contact information, not domain name registrants, registrars or gTLD registries.			
13.	The intent of Whois is to accurately record and check the registration info(or contact info) and the Chinese registration info can better serve the Chinese community.	Cui Shutian (PR China GAC Rep)		
14.	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.	FICIP		
<b>Issue #3: Should translation and/or transliteration of contact information be mandatory for all gTLDs?</b>				
15.	We support that it should be mandatory. From the statistic, around one-third of the domain names in Thailand registered with ccTLD (.th) and another two-third of the names are gTLD, which is open to all ICANN's registrars. Many cases that Thai domain owner registers for a domain name from foreign registrar, as the nature of internet is borderless. Not having translation and/or transliteration mandatory for all gTLD would create discrimination to registries and registrars.  However to minimize the impact to the cost bearer, the	Thai GAC Representati ve		

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	translation and/or transliteration of local language to common language should be established in each country. And this methodology should be accredited by ICANN.			
16.	The transformation of contact information should be mandatory for gTLDs that allow registration of domains using non-representable scripts in the current ASCII WHOIS for contact information.	ALAC		
17.	Although the ambiguities – and thereby need for clarifications – are more obvious when it comes to contact information not using the current ASCII WHOIS, there are difficulties to solve in all languages, therefore, translation and/or transliteration of contact information should 1) be mandatory for 2) all gTLDs.	IPC		
18.	For the reasons stated above, we believe that translation and/or transliteration should NOT be mandatory for any gTLDs.	NCSG		
19.	It would be appropriate that the registration info(or contact info) in Chinese script is the basic requirement in the area of China.	Cui Shutian (PR China GAC Rep)		
20.	Yes	FICIP		
<b>Issue #4:</b> 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?				
21.	It is unarguable that the translation and/or transliteration should be mandatory for those based in non-ASCII script countries. So it is possible that the non-ASCII script countries have higher priority to catalyze this issue.	Thai GAC Representative		
22.	Transformation of contact information for the purposes of a limited ASCII WHOIS would be applicable for registrants that use non-ASCII scripts in providing their registration information.	ALAC		



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	In principle registrants should not be expected or required to transform their own contact information. It is unreasonable to assume that registrants will be able to enter contact information in scripts or languages other than their local script and language. Nevertheless, it is possible that some registrants may have the ability to do so. If transformation of contact information is automated, in order to reduce the risk of data deformation/distortion, the option of allowing registrants to provide ASCII representations voluntarily at the time of entering contact information can be explored.			
23.	Should be mandatory for all (see further above).	IPC		
24.	It would be appropriate that the registration info(or contact info) in Chinese script is the basic requirement in the area of China.	Cui Shutian (PR China GAC Rep)		
25.	For the reasons stated above, we believe that translation and/or transliteration should NOT be mandatory for any registrants in any country.	NCSG		
26.	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.	FICIP		
<b>Issue #5:</b> What impact will translation/transliteration of contact information have on the WHOIS validation as set out under the 2013 Registrar Accreditation Agreement?				
27.	It occurs in Thailand that more than half of the domain name owners using gTLD and it is possible to choose foreign Registrars. The manual verification might occur when registrar does not receive an affirmative response via email or phone. Even it is not	Thai GAC Representative		

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	specified the method, this manual verification could costly for Registrar when it is cross-border verification. This also emphasizes the need of single point of registration system for common language/script of contact information for each country. To minimize any cost that might occur during verification, and the more important point is to provide the eligible contact address information.			
28.	In the event that mistakes are made, we foresee that translation and/or transliteration of contact information could possibly lead to problems in WHOIS validation. Validating contact information in the WHOIS database would likely be more successful and less burdensome if it was carried out in the original language/script provided by the domain name registrant.	NCSG		
29.	Without a proper and global solution of contact information, WHOIS validation will not be possible in many cases, thus causing severe problems that will threaten the system itself	IPC		
30.	It is necessary to keep the WHOIS validation system workable on an international base.	FICIP		
<b>Issue #6: When should any new policy relating to translation and transliteration of contact information come into effect?</b>				
31.	Thailand has been, disappointedly, in the top-5 of phishing for the past several years. From our view, we see that having translation and transliteration policy in place would be one of the phishing mitigations as the verified contact information would be the important eligible linkage between internet identities to the real person. We encourage that this policy should come into effect at the earliest possible timeline.	Thai GAC Representative		
32.	We believe that there should be no policy requiring translation	NCSG		

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	and/or transliteration of contact information. However, if this PDP WG should determine that it is desirable, the policy should not come into effect until the conclusion of the two post-Expert Working Group PDPs have been concluded (gTLD Registration Data Services EWG and Internationalized Registration Data Services EWG), and their recommendations are taken into consideration.			
33.	As this policy should in fact have been in force before the release of new gTLDs, our view is: As soon as possible.	IPC		
34.	As soon as possible, and at least within the next 12 months.	FICIP		
<b>Issue #7:</b> 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.				
35.	The decision on who should bear the burden of transforming contact information should be informed by the views of and impact on all affected parties, which would include the provider of the information (registrants), those involved in collecting and maintaining the information (i.e., registrar, reseller, registry) and the range of users that include end users and regulatory authorities/law enforcement agencies.	ALAC		
36.	“The decision on who should bear the burden of transforming contact information should be informed by the views of and impact on all affected parties, which would include the provider of the information (registrants), those involved in collecting and maintaining the information (i.e., registrar, reseller, registry) and the range of users that include end users and regulatory	IPC		

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	authorities/law enforcement agencies.”			
37.	The domain name registrant should be the only stakeholder making this decision. The registrant should decide if he/she/it (in case of an organization) will bear the cost of translating and/or transliterating the contact information associated with the registered domain name, or if this cost should be born by the end user of WHOIS lookup services. There should be no policy requiring a specific stakeholder to bear the costs, whether this be a registrant, registrar or registry. In the absence of such a policy, as is the opinion being expressed here, it would be the registrant’s choice to submit contact information during domain name registration in the language and script of his/her/its choice. In the event that the contact information is submitted in a language and script requiring translation/transliteration, it is up to the end user of WHOIS lookup services to bear the associated costs.	NCSG		
38.	The burden will have to be divided in between the registrants and the registrar.	FICIP		
<b>Issue #8:</b> 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?				
39.	In compliance with the "Proposal by THAILAND’s Government Advisory Committee (GAC)" submitted into the PDP working group earlier, it is government role to facilitate establishment of the infrastructure for translation/transliteration of contact information. Once the infrastructure is in place, the cost of translation/transliteration and the cost of validation should be economic. This eligible registered contact address information will also be applicable for many other applications for data owner, not limited to ICANN whois database but it could also	Thai GAC Representative		

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	<p>benefit the e-invoice and all electronic transaction services.</p> <p>We would suggest considering demand-oriented approach for this matter. In this case, the demand to translate/transliterate and maintain contact address information is belong to the data owners or registrants, and the demand for address validation could be from registrars. Therefore, the cost of conversion from local language into common language should belong to registrants and the cost for validation should belong to registrars.</p>			
40.	<p>Registries should bear the cost of translation and transliteration of Registrar data, and Registrars should bear the cost of translation and transliteration of registrant data. As indicated above, this is the cost of making business. The additional cost should be budgeted in the interest of end users. The transliteration and translation should not have, in any case, an effect on the final price that Registrants bear.</p>	European Commission		
41.	<p>In determining who should bear the cost, it would be important to consider whether the transformation of contact information is made for general use or specialized use.</p> <p>If the transformation is required for general use, the cost should be borne by the process/entities that collect the information. If the transformation is required for specialized use, the parties requiring the specialized service should bear the cost of contact information transformation.</p> <p>An example of general use is contact information that serves a public purpose and is made available to the general public without charging a fee (e.g., WHOIS). Specialized use is a paid service where the data requester can choose the language of</p>	ALACn		

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	required data. Groups that may require specialized use of contact information in particular languages may include Law Enforcement Agencies, the Intellectual Property Community, the Network Security Community, etc. The cost of specialized use can be negotiated between the data provider and the data accessing entity and the level of accuracy required of transformed data would have bearing on the cost.			
42.	The cost should be divided between Registries and Registrars, however also having in mind that the final responsibility of correct contact information lies on each Registrant.	IPC		
43.	As stated above, since the end user of WHOIS lookup services is the beneficiary of the service, the end user of WHOIS lookup services should bear this cost. This would become the de-facto rule if no policy requiring translation and/or transliteration of contact information be made. In any other scenario, the only purpose this policy will serve is to shift the transaction costs of translation and/or transliteration from one stakeholder to another, and ultimately serve the end user and place a burden on registrants, registrars and gTLD registries.	NCSG		
44.	The cost should be divided between registries and registrars.	FICIP		
<b>Any Other Information</b>				
45.	We finally have the promise of IDNs coming to fruition, and hopefully many new Registrars coming online in Africa and other regions, which need them. To burden these new Registrars with additional cost (of translation or transliteration) seems not only burdensome and potentially quite destructive; but will also be anticompetitive - to burden Registrars working with IDNs with	NCSG		

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	higher operating costs than English-oriented Registrars?			
46.	<p>In China the registration info(or contact info) are mainly collected by registrars in Chinese which could ensure the accuracy of the registration info.</p> <p>The registry in China should check and verify the Chinese registration info(or contact info).</p>	Cui Shutian (PR China GAC Rep)		