Comments to Draft Topic Paper from UNINETT Norid AS – The .no-registry

The 16th October 2009 the Working Group asked for input and comments on whether the Draft Topic Paper identifies all relevant topics and issues which should be covered by a policy for the selection and delegation of IDN ccTLDs. Below follows the comments from the .no-registry.

The ccNSO has repeatedly expressed its concerns about the use of country and territory names in the gTLD space and has stated that meaningful representations of country and territory names in *any* language and script, *including ASCII*, should be excluded from the gTLD space, at least until the IDN ccPDP has concluded[1]. The expectation was that the IDN ccPDP would then discuss the status of *all* of these names.[2]

While an IDN ccTLD is usually defined as a TLD that includes non-ASCII characters, we believe that the IDN ccPDP needs to also consider the country and territory names that consists of only basic Latin based characters (like e.g. Norge – Norway in Norwegian or Australia) in order to fulfill the expectations outlined above. If not, some of the country names that the ccNSO have sought to protect will fall outside of the process.

In our opinion, the underlying principle is that all scripts and languages should be treated equally, whether they are Latin-based or not. While the final conclusion may end up with different recommendations for the "basic Latin" names, the "Latin with diacritics" and the "non-Latin" names, the topic paper should make it clear that they are all within the scope of the PDP.

Some revision of questions in the topic paper might also be necessary in order to convey this message (e.g. the question on whether to limit the language and string to non-Latin scripts either in basic form or with diacritics), or possibly adding a new question about what an IDN ccTLD is, and what to do with country and territory names that does not fall under the definition.

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[1] ccNSO council resolution (Los Angeles 31.Oct 2007): "**Principle on meaningful representation of the name of a territory listed on the ISO 3166-1 in a non ASCII script:** No name of a territory listed on the ISO 3166-1 or a meaningful abbreviation of it, whether represented in a non ASCII script or in any recognised language represented in that script, shall be available as a gTLD. This principle should be revisited once the IDN ccPDP recommendation, if any, is adopted by the Board.

Principle on meaningful representation of the name of a territory listed on the ISO 3166-1 in ASCII: No name of a territory listed on the ISO 3166-1 or a meaningful abbreviation of it, whether represented in ASCII script or in any recognised language, shall be available as a gTLD. This principle should be revisited once the IDN ccPDP recommendation, if any, is adopted by the Board."

[2] ICANN's Chair, Peter Dengate-Thrush has also acknowledged that the current constraints on the introduction of new country and territory name ccTLDs in Latin script may be only temporary, and that IDN ccTLDs may include these names. (Letter to Janis Karklins 22.Sep 2009): "Meaningful representations of country and territory names in non-Latin scripts will be available under the IDN Fast Track process but country and territory names in Latin scripts are available in the gTLD program only, until the ccTLD policy development is complete".
(http://www.icann.org/correspondence/dengate-thrush-to-karklins-22sep09-en.pdf)