



3 December 2009

IDN ccTLD Draft Topic Paper

Please accept the following comments in response to the publication of the Draft Topic Paper, concerning the introduction of IDN ccTLDs.¹ Go Daddy reserves the right to future comments on this issue, and our positions include, but are not necessarily limited to those expressed herein.

1. Introduction

1.1 In general, Go Daddy supports the introduction of IDN equivalents of ccTLDs (IDN ccTLDs). The topic paper raises many important questions that need answering. Public comment may be a useful tool to begin finding those answers, but we encourage further dialogue with the community and experts. Our comments below focus on three areas of overarching concern to us.

2. Commitment to IDNA Standards

2.1 IDN TLD strings are generated or mapped to ASCII equivalents using the protocol defined in RFC 3492 ("IDNA").² In order to preserve the stability and interoperability of the DNS for all Internet users, we emphatically believe that the commitment to the IDNA protocol by IDN ccTLDs must be absolute. This includes any future modifications, improvements, or expansion of IDNA.

3. Commitment to Financial Agreement

3.1 Question 13 of the Draft Topic Paper discusses the nature of the financial commitment of IDN ccTLDs and ICANN. We reiterate our previous positions that a stronger relationship be a requirement for IDN support, beyond the existing voluntary contribution arrangement.

3.2 The FY10 Operating Plan and Budget notes that Country Code and ccNSO activities is expected to account for nearly 17% of ICANN's FY10 expenses, but ccTLD contributions are expected to account for only 3% of ICANN's revenue, a gap of ~14%.³ Maintaining the current voluntary contribution program, especially considering the additional expenses associated with the introduction of IDN ccTLDs, we expect the gap will only continue to grow.

3.3 It is therefore imperative to ensure that operators of IDN ccTLDs are paying appropriate, cost recovery based fees to ICANN.

4. Number of IDN ccTLDs per Territory

4.1 Question 3 of the Draft Topic Paper asks if there should be limitations on language / script combinations per country or territory.

4.2 In our opinion, this is a resource-contention issue. While many countries can make legitimate cases for multiple language / script combinations, they must acknowledge that this could result in delayed introduction for IDN ccTLDs for others seeking their first language / script combination, or delay in the introduction of gTLDs in general.

4.3 Therefore, we recommend that the program be initially limited to one language / script combination per country or territory, and until such time that all initial requests can be processed.

Conclusion

We appreciate the opportunity to comment on this topic, and look forward to continued participation with ICANN and the ccNSO in the introduction of IDN ccTLDs.

Sincerely,
GoDaddy.com, Inc.



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References:

1. <http://www.icann.org/en/announcements/announcement-04nov09-en.htm>
2. <http://tools.ietf.org/html/rfc3492>
3. <http://www.icann.org/en/financials/adopted-opplan-budget-fy10-07jul09-en.pdf>