

CDNC Comments on IDN Variant TLD Program - Revised Program Plan

General comments

The Chinese Domain Name Consortium (CDNC), on behalf of the Chinese language community, respects the continuous efforts made by the IDN Variant Issues Project Coordination Team (VIP Team) to sort out the issues involved in the delegation and use of IDN Variant TLDs. With regard to the recently published "IDN Variant TLD Program - Revised Program Plan" ("Revised Plan"), we appreciate the revisions made in accordance with our comments submitted in the last round of public comment period, especially for the reprioritization of whole string variant feasibility study and mirroring variant feasibility study. CDNC reckons that these revisions can accelerate, to a certain extent, the delegation process of IDN Variant TLDs and increase further competition and choice in the domain name market.

However, we also recognize that, this revised plan has withheld another piece of comment we have submitted last time:

"Since each language/script community has different levels of maturity and experience for the implementation of IDN variants, the project shall not disadvantage communities with relatively mature IDN variant solutions for the purpose of coordination with other languages/scripts communities. Instead, the implementation of IDN variant TLDs shall proceed in a consistent and coherent manner with the current status of variant issues of each language/script. Therefore, work should be directed towards establishing an IDN variants implementation process framework to allow languages/script communities to proceed through it separately according to different timelines."

In response to our comments, two reasons have been given by ICANN for dropping this piece of suggestion: First, "the root zone is a shared resource, and the management of the root zone should accommodate, to the maximum extent possible, the needs of users of multiple global scripts". Second, "as the implementation process has not been established, there is no agreed definition of what constitutes 'readiness' for IDN TLDs. Whether it is possible or desirable to

permit different communities to proceed at different speeds will be determined by the results of the proposed project P2.1 (Process for IDN Table Creation and Maintenance of the Root)".

In response to ICANN's reply, we want to clarify that, our suggestion is not in fundamental conflict with ICANN's goal of coordinating different languages/scripts in the root zone. Otherwise, it can help ICANN to accommodate the needs of users of multiple global scripts.

First of all, we acknowledge that concerns on the variant issues from different languages/scripts can be reconciled. If ICANN can accommodate their needs in the root zone, the compatibility of the root zone will be improved for all the language and scripts. Nevertheless, such accommodation of various needs, however, does not necessarily require a parallel timeline for different languages and scripts. Differentiated timelines can also achieve this goal by the means of incremental modification and update of the implementation process in accordance with the emergence of new concerns. In contrast, if the implementation of IDN variant TLD over-emphasizes the unified timeline and neglects the varied development status on variants issues of each languages/scripts community, the ultimate unified solution can be even more unsatisfactory for its lack of real-world implementation test and its incongruity with IDN variant solutions used by different languages/scripts communities. Furthermore, the unified timeline is also in conflict with the bottom-up principle of policy making.

Second, as different languages/scripts communities have varied concerns with regard to implementation of IDN Variants TLDs in the root zone, the accommodation of different languages/scripts on IDN variants needs is estimated to be a lasting process. A precipitate unified implementation process with a parallel timeline for different languages and scripts might be difficult to achieve consensus among different communities. Therefore, the delegation process of IDN TLD might be delayed significantly. In contrast, by prioritizing the process of widely accepted IDN variants solutions, the uncertainty can be reduced to a certain level. For example, RFC3743, as the most mature and widely accepted standards of implementing IDN Variants domain names, can be initially followed by certain IDN Variants TLDs in the delegation process. Its prioritized implementation process can serve as a reference for further implementation of IDN Variants TLD in the root zone. Besides, the

hands-on experience of implementation IDN variants TLDs can also facilitate the development of IDN variants solutions in other language and scripts communities. Besides, for the purpose of accommodating further needs from other languages and scripts communities, the VIP team shall update and ameliorate the process in the event of new languages/scripts TLDs get in the root zone. Furthermore, suggestions of best practice of implementations of IDN variants TLDs can be forwarded to the less developed communities with regard to IDN variants issues.

CDNC reckons that there will be a lot more variant TLDs using different languages and scripts, such as Thai and Hebrew, to be delegated in the near future. Even if the implementation process study coordinates variants issues of the 6 languages for this time, the final outcome might still be challenged by newly involved languages. Updates and refinement of the standards and process for the implementation of IDN variants TLDs in the root zone might still be required anyway. Otherwise, only by establishing an open process and standards, which can be updated from time to time, for implementing IDN variants TLDs in the root, can the coordination of different languages and scripts be achieved to the maximum extent.

In conclusion, CDNC suggests the VIP team to prioritize of the study of implementation of widely accepted and utilized IDN variants solutions and to allow IDN TLDs adopting such solutions to be delegated according to a differentiated timeline in accordance with their development level. And the implementation process shall be open to updates for accommodating the needs of other emerging Variants TLDs in order to establish a best practice for implementing Variant TLDs in the root zone. CDNC contends that differentiated timelines not only help to reduce the time cost and disadvantages caused by the parallel study of IDN variants TLDs of different languages/scripts, but also accelerate the overall delegation process of IDN TLDs.

As the ultimate purpose of new gTLD program is to promote diversity and competition of Domain name services, the IDN TLDs can certainly help to achieve this goal and enhance the overall acceptance of DNS among diverse communities. However, with the various concerns of variants TLDs, CDNC suspects that, the delegation of many IDN TLDs can be delayed, which can significantly undermine their competence for their later move among new gTLDs. Therefore, in order to maintain the fair competition in the new gTLD market, CDNC suggests that VIP team shall

increase their working efficiency to ensure that IDN Variants TLD can be delegated in the first batch in 2013.

Specific Comments:

The detailed comments for the Revised Program Plan are as following:

Comment on Project 1. IDN Tables Format

CDNC accepts ICANN's plan for the standardized IDN Table Format in the root zone. According to the community input from experienced registries, CDNC contends that a compatible IDN Table can laid solid foundation for IDN domain name registration, resolution and further IDN variants issues.

For the IDN Tables Format project, CDNC would be glad to contribute its experience of table creation and maintenance for the study. We have analyzed the RFC draft named "Representing Registration Policy for IDNs Using XML" as a part of this project. The result suggests that this proposed format can be easily transferable with the table format defined by RFC 3743. CDNC suggests that if variant gTLD applicants can submit their table format in accordance with RFC 3743, they do not need to wait until the final approval of this RFC draft for the delegation process. Therefore the delegation process can be done in parallel with this project. And CDNC will continuously support the IDN table format standardization.

Comment on Project 2.1: Developing the IDN Table Creation and Maintenance Process for the Root

According to our experience, the Table Creation and Maintenance Process relies on the table format development. With years of IDN table creation and maintenance experience, CDNC has worked out solid standards and processes for supplement and removal of code points. CNNIC can provide its experience as a reference for the project 2.1.

Comment on Project 2.2: Implementation of the Root IDN Tables Processes

CDNC believes that the delegation of IDN TLD completely relies on the table format development. Therefore the ideal approach to decide whether the IDN TLD

can be delegated is to examine its submitted IDN table. Therefore the work of the project 1 shall be emphasized and then later process shall be simplified and diversified in accordance with its development status.

Comment on Project 6. Examining the User Experience Implications of Active Variant TLDs

CDNC is willing to join force with VIP team for the research on user experience implications related to variants issues. CDNC would like to share its prolific results from user experience research on Chinese Variant Domain Names with ICANN community members including the former experience of .中国\中國 in order to make further contributions for this project.