

Summary public comments received on the Draft Proposal for the Study of Issues Related to the Delegation of IDN Variant TLDs

Commend period: 21 February 2011 – 6 April 2011

Background:

The delegation and management of Variant TLDs remains an important issue. The ICANN community seeks to develop solutions to enable the delegation of Variant TLDs for the benefit of users in different regions. ICANN published for public comment a Draft Proposal for an IDN Variant Issues Project – a proposal for moving this work forward. Below is a summary of the comments received through the public comment forum.

Contributors:

The public comment period was opened on 21 February 2011 and closed on 6 April 2011. A total of ten community submissions were posted to the forum. The contributors are listed below in chronological order by posting date:

- Vaggelis Segredakis, Administrator of the .GR Top Level Domain, Institute of Computer Science, Foundation for Research and Technology – Hellas
- Dr. Sarmad Hussain in his personal capacity
- At-Large Advisory Committee (ALAC)
- Dr. Mahesh Kulkarni, Programme Coordinator & HEAD GIST, Centre for Development of Advanced Computing
- Siavash Shahshahani
- Xiaodong Lee, VP&CTO - CNNIC, Professor - Chinese Academy of Sciences
- J. Scott Evans, IPC President, on behalf of the Intellectual Property Constituency
- Joseph Yee (JY)¹
- Edmon Chung, on behalf of APRALO
- Yang Yu, China Organizational Name Administration Center (CONAC)

Main Themes:

Commenters welcomed the five case studies outlined in the proposal. Several commenters commented on the definition of variant as included in the project proposal. Several commenters commented that the work of the Chinese case is largely done and therefore it is not necessary to commit to one timeline for all the case studies identified in the project. One comment stated that ICANN should not delegate any IDN variants until work items 3 through 8 defined in the proposal have been completed and vetted through the ICANN community. Some commenters gave advice on the composition of the case study teams and the need to keep them at a manageable size while giving the relevant community visibility into the team's work to provide input.

Below is a summary of each of the comments:

Summary of comments from Vaggelis Segredakis (VS):

¹ Comment was submitted on 6 April, but was not confirmed until 11 April.

VS noted that the proposal does not include a case study for the Greek script. He gave detailed example explaining how the Greek word for the name of the country (Hellas/Greece) is impacted by the use of the “tonos” or accent marks, and how the word changes in lowercase vs. upper case letters. The Greek script is further impacted by the change to how Greek characters are treated between IDNA2003 and IDNA2008. VS explained that this case is very common in Greek words and therefore the use of variants should be considered. The commenter recommended that ICANN add a sixth case study for Greek.

Summary of comments from Dr. Sarmad Hussain (SH):

SH noted that the project document should clarify if the case study teams should identify issues that are relevant at the language level or script level or both. He explained that while two characters may be variants at the language level, the same might not be true at the script level. SH commented that language level variants may require a larger effort. He also explained that language level variants are normally relevant to ccTLDs while script level issues could be more relevant to gTLDs. The proposal does not differentiate between language level and script level variants.

SH also commented on the definition of the Indic case. He explained that unlike the four other proposed cases, Indic does not represent a single script. Linguistically Indic may be used to refer to Brahmic derived scripts, which cover a wide variety of scripts that “are too diverse for a small sub-group to analyze in a short amount of time.” As a result, SH recommended that the scope of script(s) in the Indic case should be more clearly defined.

Finally SH commented on the cross script similarity, especially in the case of Cyrillic and Latin Scripts. He explained that a TLD requester could propose strings that are visually not distinguishable across scripts, which would compromise the user experience.

Summary of comments from ALAC:

ALAC welcomed the proposal and noted the importance of IDN variant TLDs. They echoed the need for the proposed approach to consider the “cultural and geo-political challenges of each case” and that some cases may be ready to proceed sooner than others.

ALAC also called for the consideration of related scripts, for example “the consideration of Greek along with Cyrillic and Latin, the consideration of the different scripts and languages in the Arabic and Indic cases, and the consideration of Japanese Kanji and Korean Hanja along with Chinese.”

With regards to the definition of variant included in the proposal, ALAC discussed what should be considered in the definition and proposed an update to the working definition as follows:

IDN Variant Labels contain one or more characters that have IDN Character Variants. IDN Character Variants occur where a single conceptual character (or string of characters) can be identified with two or more different Unicode Code Points (or string of Unicode Code Points) with graphic representations that may or may not be visually similar. IDN Variant domains are

considered distinct entries to the DNS by protocol standards, but are considered integral with the corresponding Primary IDN by policy.

Finally ALAC commented on the composition of the case study teams. ALAC stated that it would be crucial to have reasonably sized teams to ensure efficiency while making sure there is enough visibility into the work of each team to ensure completeness.

Summary of comments from Dr. Mahesh Kulkarni (MK):

MK gave feedback on the quality of the posted documents in general. He commented about the quality of translation in the Hindi document, for example the term used for variant might not be the correct term.

On the definition of variant included in the proposal, MK commented that this definition may be problematic and may work for some scripts but not others. He advised that the definition be expanded and for more examples to be provided.

MK also commented on the identified work plan, specifically work item numbers 1, 2 and 4. MK explained that even though work item number 4 is proposed for a later stage, it is closely related to item numbers 1 & 2. MK recommends that the scope of work item number 1 be expanded to include “vetting for culture and acceptability within an ethno-linguistic group should be advocated as a caveat.” He also provided guidelines for work item numbers 2 & 4 to include more parameters.

Finally MK advised that perhaps a committee could be formed to gather criteria for variants (*it is not clear what is meant here*).

Summary of comments from Siavash Shahshahani (SS):

SS commented that the proposal is a reasonable initiative but cautioned that the issues discussed in the proposal are not new. He recalled that the variant problem was discussed in ICANN meetings as early as 2005. He hoped that the upcoming project would undertake an effort to prioritize the issues in terms of urgency and user needs.

Summary of comments from Xiaodong Lee (XL):

XL welcomed the project to solve the variant issues except for the proposed timeline for a synthesized issues report by December. XL commented that the work of the Chinese case is largely done and therefore it is not necessary to commit to one timeline for all the case studies identified in the project. XL explained that experts from the region have worked together for the last ten years and published several RFCs that solve the issues of variants for these communities. He also commented that these solutions have proven to be successful for the past several years, including after the delegation of Chinese variants at the top-level. XL offered to share the Chinese experience with ICANN as needed.

Summary of comments from J. Scott Evans (GNSO Intellectual Property Constituency (IPC)):

The IPC welcomed the project proposal and reiterated the importance of identifying the technical and policy issues associated with the delegation of variant TLDs. The IPC stated that it strongly believed that ICANN should not delegate any IDN variants until

work items 3 through 8 defined in the proposal have been completed and vetted through the ICANN community. As such, the IPC believes that the proposed timeline should be revised accordingly.

The IPC also raised some concerns regarding the composition of the case study teams, specifically the linguistic expertise in relation to the definition of the project proposal stated in the document. As a result, the IPC recommended updating the description of linguistic experts to be revised to “linguistic experts in the language(s) to which the script corresponds and experience with issues of user confusion arising from translation/transliteration, and Unicode experts from the local community.”

Summary of comments from Joseph Yee (JY)

JY would like to bring attention to the working group of RFC 3536 (“Terminologies used in Internationalization in the IETF”). While this document does not talk about variant, JY mentioned it hold a great set of definitions that this working may consider to adopt as base.

Summary of comments from APRALO:

APRALO welcomed the proposal and emphasized the importance of variant IDN TLDs. APRALO cited the work already completed by several communities and encouraged ICANN to “complete its adoption of bottom-up developed IDN Variant policies for the language communities where policy and operational experience is already mature and proven.”

Regarding the proposed study cases, APRALO expects that the creation of separate cases allows each case to be unique and therefore delays in one case will not impede progress of another.

Finally APRALO commented on the structure of the case study teams and advised that the experience of members from the Asia Pacific community should be leveraged as they have extensive policy and operational expertise in this area. APRALO commented that they should be consulted to identify the appropriate team members for the case studies. They also stated the need to form reasonably sized teams to ensure efficiency while making sure there is enough visibility into the work of each team to ensure completeness.

Summary of comments from CONAC:

CONAC raised two issues. First, they believe that the deadline for issues report publication should not go behind the pace of whole new gTLD program and that research should be conducted on a case-by-case basis and feasible solutions accordingly. Second they noted that more communication is needed between the variant study team and the language community involved. They suggest liaisons between communities and the study team as well a need for communication between IETF and ICANN done in a transparent manner.

Next Steps:

This Summary & Analysis document will be shared with the members of the ICANN IDN Variant Issues Project team. The project proposal will be updated based on the input received and be published shortly.

References:

Project Proposal: <http://www.icann.org/en/topics/new-gtlds/idn-variant-tlds-delegation-21feb11-en.pdf>

Links to comments received:

Vaggelis Segredakis: <http://forum.icann.org/lists/idn-variant-tld/msg00000.html>

Dr. Sarmad Hussain: <http://forum.icann.org/lists/idn-variant-tld/msg00001.html>

ICANN At-Large Staff: <http://forum.icann.org/lists/idn-variant-tld/msg00002.html>

Dr. Mahesh Kulkarni <http://forum.icann.org/lists/idn-variant-tld/msg00003.html>

Siavash Shahshahani: <http://forum.icann.org/lists/idn-variant-tld/msg00004.html>

Xiaodong Lee: <http://forum.icann.org/lists/idn-variant-tld/msg00005.html>

J. Scott Evans: <http://forum.icann.org/lists/idn-variant-tld/msg00006.html>

Joseph Yee: <http://forum.icann.org/lists/idn-variant-tld/msg00009.html>

Edmon Chung: <http://forum.icann.org/lists/idn-variant-tld/msg00007.html>

Yang Yu: <http://forum.icann.org/lists/idn-variant-tld/msg00008.html>