**Consolidated overview of comments on
Draft Final Report Single character IDN TLD's**

15 February 2011

Draft Final Report relating to policy aspects of introduction of Single Character IDN TLD's
15 February

Draft Executive Summary of comments and their considerations.

All comments indicate an appreciation of the work by the working group and indicate support of the introduction of Single Character IDN's and recommendations of the Workin Group. However, depending on the script, additional measures are suggested to be taken into consideration by the workin group. It is also noted that clarifications are requested and suggested to the Draft Final report itself.

Some comments relate to ongoing work of the JIG and discussion taking place in other area's of the new gTLD and IDN ccTLD's processes, for example variant management. The working group notes that to the extent the discussions in these area's are taking place in other ICANN fora and have not been concluded to date, the issues should be raised there.

1. Introduction

The JIG published its Draft Final report on the introduction of Single Character Internationalized Top-Level Domain Names (IDN TLD's) on 4 December 2010 to solicit input and comments from the community on the following recommendations:

The JIG solicited input from the community on its recommendations regarding the implementation of Single Character IDN TLDs

- A. Single Character IDN TLDs should be acceptable under the IDN ccTLD Fast Track Process and under the overall policy in IDN ccPDP, taking into account the findings from this report.
- B. The GNSO policy recommendation in the Final Report for the Introduction of New Generic Top-Level Domains for Single Character IDN TLDs should be implemented.
- C. The definition of an "extended grapheme cluster" from section 3 of Unicode Standard Annex #29, should be used to define the concept of a "Single Character IDN" TLD / Label / String.
- D. Requested Single Character IDN TLD strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language. Single Character IDN TLDs should be acceptable, taking into account the specific requirements as contained in the Draft Final Report.

In the draft Final Report each recommendation was described more extensively along with recommendations for implementation.

The public comment period initially run until 30 December 2010, but was extended until 12 January 2011.

In the course of the public comment process 7 comments were received, excluding one comment that was submitted for the second time. The details of the persons and entities who have submitted comments are listed in Annex A. The submissions can be viewed at:
http://forum.icann.org/lists/jig-draft-final-report/

In the balance of this overview comments that refer to the Draft Final Report in general, including comments that are not directly related to work of the JIG are presented in section 2 General Comments.. Comments that refer to the recommendations or a specific section in the Draft Final reprot are presented in the context of language of the Report (Section 3).

2. General Comments

Comments

ALAC Statement

Many languages around the world use scripts where a complete word is written as a single character. Therefore, ALAC supports the recommendation that Single Character and Two Characters IDNs at the Top Level and Second Level should not be restricted in general and be reviewed on a case-by-case basis.

The JIG is urged to continue its work on IDN TLD variant issue which in the view of ALAC is of the utmost important to certain communities around the world

Hiro Hotta

As a CJK script user, he recognizes the necessity of single character IDN TLDs, and is therefore generally in support of the recommendations.

Registries Stakeholder Group (RySG)

The RySG reiterates its previous statement submitted on 9 September 2010 and reaffirms its stated position on the GNSO Final Report on the Introduction of New gTLDs:

> *"[For Single and Two Character IDN strings at all levels,] Single and two-character U-labels on the top level and second level of a domain name should not be restricted in general. At the top level, requested strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language used in order to determine whether the string should be granted for allocation in the DNS."*

The RySG believes that the draft final report thoroughly addresses the possible issues identified in the group and raised in the public comments. In particular, the RySG supports specific JIG recommendations for IDN gTLDs and believes that they mitigate possible problems

The RySG believes the JIG has developed a set of recommendations that address the technical and policy issues that could result in stability and security problems while at the same time meeting the needs of users of scripts in which single U-labels are widely used.

Hong Kong Internet Registration Corporation Limited (HKIRC)

HKIRC supports the positions of the Draft Final Report by the joint ccNSO and GNSO IDN working group (JIG) on the matter of single-character IDN TLD.

APTLD

APTLD supports in principle the positions of the Draft Final Report by the joint ccNSO and GNSO IDN working group (JIG) on the matter of single-character IDN TLD.

Internet Society of China (ISC)

Internet Society of China (ISC) highly appreciates JIG's efforts on single character IDN TLDs. However ISC suggests that Single Character IDNs policy will need to be investigated/revisited only after the IDN variant policy issues are resolved appropriately.

China Internet Network Information Center (CNNIC)

CNNIC would welcome the introduction of single character IDN TLDs in general. However it suggests that the recommendations should be adopted at the same time as, and along with, other

mechanisms, which still need to be developed, such as the variant management mechanism and the confusion detection mechanism. Chinese characters have one or more variant forms. Without a decent variant management mechanism in place, introducing single character IDN TLDs will also have big problems.

Draft Consideration of the comments
All comments received support the introduction of Single Character IDN's in general, and the general thrust of the recommendations of the JIG.

The JIG notes that some of the commentators advise that single character IDNs should be introduced after the IDN variant management issues are resolved, including the policy aspects have been resolved. The JIG acknowleges this an important issue , however in the view of the JIG the variant management issue is not limited to single character IDN TLD and should be resolved as soon as feasible for both single and multiple characters IDN TLDs. Note that policy aspects of variant mangement is the next topic on the agenda of the JIG as well as discussed in other fora.

The JIG also notes that some commentators refer to the introduction of Single Character IDNs at the second level. In the view of the JIG this is not a matter for the JIG, but is discussed and should be raised in other fora.

3. Specific comments on JIG Implementation Recommendations on Single Character IDN TLDs

Language in Draft Final Report
The JIG makes the following recommendations regarding the implementation of Single Character IDN TLDs:

A. Single Character IDN TLDs should be acceptable under the IDN ccTLD Fast Track Process and as part of the recommendations for overall policy in IDN ccPDP, taking into account the findings from this report

B. The GNSO policy recommendation in the Final Report for the Introduction of New Generic Top-Level Domains for Single Character IDN TLDs should be implemented.[1]

C. The definition of an "extended grapheme cluster" from section 3 of Unicode Standard Annex #29, where a combining sequence of a base character and combining mark(s) appears to be a single character, should be used to define the concept of a "Single Character IDN" TLD / Label / String.

D. Requested Single Character IDN TLD strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language. Single Character IDN TLDs should be acceptable, but must not be confusingly similar to single or two character ASCII TLDs. For alphabetic script Single Character IDN TLDs, other technical aspects of

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[1] http://gnso.icann.org/issues/new-gtlds/pdp-dec05-fr-parta-08aug07.htm "Single and two-character U-labels on the top level and second level of a domain name should not be restricted in general. At the top level, requested strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language used in order to determine whether the string should be granted for allocation in the DNS with particular caution applied to U-labels in Latin script."

confusability may be taken into consideration, such as the likelihood of user slip with relevance to keyboard layouts .

Other restrictions, qualifications and requirements for ASCII and two-or-more character IDN TLD strings should equally apply to Single Character IDN TLD strings, including but not limited to considerations of geographical names, similarity and confusability, intellectual property rights, etc.

Comments on Recommendation D
ALAC
Single Character and Two Characters IDNs at the Top Level and Second Level should not be restricted in general and be reviewed on a case-by-case basis.

ALAC believes that an IDN Evaluation Panel could be established to review applications for Single Character or Two Characters IDNs. The IDN Evaluation Panelists should be composed of relevant individual experts and community representatives. The IDN Evaluation Panel could also assist with the review of contentious IDN ccTLDs.

Hiro Hotta, HKIRC and APTLD
In the report it is stated that requested single character IDN TLD strings should be analysed on a case-by-case basis in the new gTLD process. The case-by-case analysis should also apply to the IDN ccTLD Fast Track Process. As a result, respective editorial revision to the IDN ccTLD Fast Track Implementation Plan should also be added in Section 5 of the Draft Final Report.

Internet Society of China (ISC)
In Chinese scripts, generally only the words composed by two or more characters are of specific meanings. Single Chinese character usually have different meaning or implication; particularly some single Chinese characters have special implication related to geographical name (abbreviation or common name), nationality, family name etc. Thus, single Chinese characters used as TLDs are easy to cause misinterpretation or confusion. ISC suggests that ICANN and JIG should pay more attention to the advice raised by other stakeholders from Chinese communities, taking the uniqueness of Chinese language into account, and respecting the Chinese users' usage behavior in order to avoid causing confusion.

CNNIC
CNNIC understands single Chinese character string often shares similar meaning with a two-character Chinese string, and some single Chinese Characters are used as acronyms to refer to geographical names or other specific noun phrases. If not properly addresses, it might cause users' confusion.

Draft Considerations of comments
The JIG WG notes the general support for the recommendation that Single Character IDN TLD strings should be analyzed on a case-by-case basis in the new gTLD process and taking into account the specifics of the script and language.

With regard to the comments that the case-by-case analyses should also apply to the IDN Fast Track process, it is the the understanding of the JIG that the suggested analysis is already implemented in the Fast Track process as part of the technical evaluation of the string (see Final Implementation Plan section 5.6.3) To the extent the Fast Track will include single character IDNs, the analysis should apply as well.

With regard to the suggestion to an IDN Evaluation Panel to review applications for Single Character or Two Characters IDNs the working group notes that the discussions in these area's are taking place in other ICANN fora and have not been concluded to date and therefore should be raised there for example in the new gTLD Implementation process and the IDN cc policy development process.

The JIG notes the comments that some single Chinese characters and possibly some in other scripts as well are used as acronyms to refer to geographical names or other specific noun phrases. Regarding this issue the JIG WG reiterates its view that other restrictions, qualifications and requirements for ASCII and two-or-more character IDN TLD strings should equally apply to Single Character IDN TLD strings, including but not limited to considerations of geographical names, similarity and confusability, intellectual property rights, etc. The WG notes that dsicussions regarding the restirctions, qualifications and requirements for IDN TLD strings in general are taking place in other ICANN fora and have not been concluded to date and therefore should be raised there.

4. Specific comments on other aspects of the report

Comments on section 1. Introduction & Background

Language in Draft Final Report
During the deliberations of the New gTLD PDP, a GNSO IDN WG was formed in November 2006 (http://gnso.icann.org/issues/idn-tlds/idn_working_group-18nov06.htm) to address policy issues that may arise from the introduction of Internationalized Domain Names at the top level (IDN TLDs). The IDN WG produced a final Outcomes Report (http://gnso.icann.org/drafts/idn-wg-fr-22mar07.htm) in March 2007. Recommendations from the Outcomes Report were eventually incorporated into the GNSO Final Report on the Introduction of New gTLDs (http://gnso.icann.org/issues/new-gtlds/pdp-dec05-fr-parta-08aug07.htm). The Reserved Names working group (formed as part of the New gTLD PDP) also deliberated on issues relevant to the introduction of IDN gTLDs. The Reserved Names WG Final Report (http://gnso.icann.org/issues/new-gtlds/final-report-rn-wg-23may07.htm) was also incorporated into the GNSO Final Report on the Introduction of New gTLDs. On the issue of Single Character IDN TLDs, the relevant recommendations include:

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> **6. Single Letters:** *We recommend reservation of single letters at the top level based on technical questions raised. If sufficient research at a later date demonstrates that the technical issues and concerns are addressed, the topic of releasing reservation status can be reconsidered.*
....

Comments
Comments Hiro Hotta and APTLD
The term "letters" is not properly defined. It apparently means ASCII letters.

Draft Consideration of comment
The referenced section in the draft Final Report is a direct quote from the Reserved Names WG Final Report and can therefore not be changed. This being said the point is well-taken.

Comments on Section 6 Suggested Edits to New gTLD Applicant Guidebook

Language in Draft Final Report
In order to implement the above recommendations, the JIG makes the following editorial suggestions to amend the New gTLD Applicant Guidebook:
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    V.   The following edits are suggested for Module 2, Section 2.2.1.3.2 String Requirements, Part III 3.2.1:

        It is visually similar to any one-character <u>ASCII</u> label ~~(in any script)~~; or

Comment
Hiro Hotta
The background of this editing proposal is unclear. It seems reasonable that "the visual-similarity to any label in any script (not only in ASCII)" should be avoided as the original sentence means.

Draft Consideration of the comment
 The current wording in the Draft Applicant Guidebook was written with the context that all one-character labels are reserved, and therefore, the requirement was written to follow the principle that new gTLD strings should not be confusingly similar to a reserved string. The suggested change is necessary as it anticipates single-character IDN TLDs to be allowed, therefore, the consideration for confusability between any two-character (or more for that matter) strings with one-character IDN strings should be no different than the contention between any existing TLD or any applied for TLD strings.

Annex A: Submissions received

ALAC statement
Received: 3 January 2011

Hiro Hotta, JPRS
Received: 6 January 2011

Registries Stakeholder Group (RySG)
David Maher,
Received: 6 January 2011 (originally submitted 5 January without attachment)

Hong Kong Internet Registration Corporation Limited (HKIRC)
Henry Chan,
7 January 2011

Asian Pacific Top Level Domain (APTLD)
Jian Zhang
Received: 11 January 2011

Internet Society of China
Received: 12 January 2011

China Internet Network Information Center (CNNIC)
Tan Yaling
Received: 13 January 2011