

Consolidated overview comments

Initial Report policy aspects introduction of single character IDN's

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Summary of Comments on Initial Report relating to policy aspects of introduction of Single Character IDN TLD's

Introduction

The JIG published its Initial report on the introduction of Single Character Internationalized Top-Level Domain Names (IDN TLD's) on 27 July 2010 to solicit input and comments from the community on the following issues of policy aspects for Single Character IDN ccTLDs

1. Possible confusion with reserved single character ASCII TLD strings
2. Whether special financial considerations should be considered
3. Whether due to the relatively smaller pool of possible names that special allocation methods should be considered
4. Whether due to the relatively shorter string, it may be easier for users to make mistakes, and that special policies should be considered
5. Whether additional criteria should be introduced to qualify a Single Character IDN TLD as an IDN ccTLD or IDN gTLD
6. Whether special policies are required to address usability of Single Character IDN TLDs given existing application environments

In the Initial report each issue was described more extensively along with some preliminary viewpoints on possible ways to address the issues and further comments.

In the course of the public comment process 7 comments were received. One comment considered Spam. Three comments were in consultation with the co-chairs were submitted after closure of the public comments period. The details of the persons and entities who have submitted comments are included in Annex A. The submission can be viewed at: <http://www.icann.org/en/public-comment/public-comment-201009-en.htm#jig-initial-reportd>

In the balance of this comments overview the comments are summarised and presented as general comments or comments on the identified issue (1-6 above) and viewpoints. If no comments were received on a specific issue area this is noted.

Executive Summary of comments and their considerations.

All comments indicate an appreciation of the work of the working group and indicated to be in support of the introduction of Single Character IDN TLD's. However, it is noted that depending on the script different issues may emerge, which each may need to be addressed separately. It is also noted that some comments relate to other area's of the new gTLD and IDN ccTLD's processes, for example topics of the Draft Application Guidebook version 4. 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.

General comments

Comments

The Queensland Law Society

Summary: The Queensland Law Society (Australia) expressed its concern that the introduction of Single character IDN TLDs as new gTLD's are subject to similar potential for confusion as domains applied under the new gTLD process. Issues identified with the Draft Applicant Guidebook version 4 will be relevant for single character IDN gTLDs, as it assumed that the relevant procedures set out in DAG 4 will be used to administer the application and dispute resolution process in relation to the introduction of single character IDN gTLD's rules. According to the submission there is a significant potential for:

- dilution or erosion of intellectual property rights
- consumers, businesses and rights-owners to be misled due number of aspects identified in relation to the Draft Application Guidebook version 4.
- therefore a significant loss of faith and confidence in the DNS moving forwards

Registries Stakeholder Group (RySG)

The RySG continues to stand by 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."

Moreover, the RySG believes that the new gTLD string evaluation and dispute procedures in the Draft Applicant Guidebook, version 4 should be applicable to IDN strings which do not impact the stability and security of the DNS.

The RySG would be supportive of an eventual release of single character IDN TLDs at a time when there are no remaining technical or policy issues that could result in stability and security problems, recognising that the JIG initial report is a contribution to the finalization of policies that are still pending.

Consideration of the comments

At this stage of the discussion the working group assumes that the rules and procedures for the application of new gTLD's will be fully applicable to single character IDN gTLD's. The working group notes that the discussion on topics raised in the comments and other topics are still under discussion and are conducted in other ICANN fora. According to its mandate the JIG will advise the GNSO and ccNSO on relevant policy aspects specifically related to introduction of single character IDN's. As such, comments on or issues with for example the Draft Application Guidebook version 4 (or later versions, if any,) or other topics not specifically related with the introduction of single character IDN's should be raised in the appropriate fora.

APTLD comment

According to the APTLD one CJK character has the same expressive power and the same degree of meaning distinctiveness as an ASCII string with three letters. If Single Character IDN TLD would not be available, users of CJK would be marginalised.

Consideration of comment

The comment is noted, and are considered to support the work of the working group.

Issue 1. Possible confusion with reserved single character ASCII TLD strings*Comments*

Chuck Warren

The questions raised in the initial report are similar to the questions raised, and discussed in the RN-WG Final Report [May 07]. Over time much has evolved at ICANN, including advancing the introduction of IDNs. With the consideration of the allocation of single character IDNs as TLDs, it is time for ICANN to recognize and establish a mechanism for the discussion and consideration of the allocation of single letters (ASCII) as gTLD's in parallel to avoid possible confusion.

APTLD

APTLD is aware that for alphabetic scripts such as Arabic, single Character IDN's might give rise to confusion with other strings. This should be further studied.

Consideration of the comments

Both comments are noted. The issue of string confusion whether between IDN and ASCII string or within specific scripts will be further considered by the WG. The working group notes that its scope is limited to IDN's, and therefore does not consider ASCII character strings.

Issue 2 Whether special financial considerations should be considered*Comments*

Chuck Warren: In the past proposals have been submitted to ICANN that would address mechanism to address surplus funds that were the results of any such allocations, including contributing to capacity building and enhancing participation mechanisms in ICANN's various processes.

Consideration of comment

The comment is noted, however the issue raised is addressed in other ICANN fora, for example the Joint SO/AC Working Group on New gTLD Applicant Support (JAS WG).

Issue 3. Whether due to the relatively smaller pool of possible names that special allocation methods should be considered*Comments*

Chuck Warren

It may be necessary to adapt the proposed allocation mechanisms now proposed which address conflicts or established rights in a string through trademark rights or established use, but it is possible that the proposed mechanisms now under discussion for the DAG can be adapted to address the allocation of the small number of ASCII single characters as gTLDs

CDNC

The Chinese Domain Name Consortium agrees with the JIG's position that Issues such as character similarity, stability / security, and protection on geographic names shall be managed and resolved in the New gTLD program or IDN ccPDP, where applicable.

APTLD

APTLD is of the opinion that the allocation method according to the current Draft Application Guidebook (version 4) takes into consideration the economic value of the strings. Devising additional methods is unlikely to improve it further and would only add unnecessary complexity to the process.

Consideration of comment

The comments are noted, however some relate to other area's of the new gTLD and IDN ccTLD's processes, for example topics of the Draft Application Guidebook version 4. 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.

Issue 4. Whether due to the relatively shorter string, it may be easier for users to make mistakes, and that special policies should be considered

Comments

Chuck Warren

It is unclear that merely typing one character in fact leads to more errors than typing complex words or combinations of words which is commonly done today at the second level

Consideration of Comment

The comment is noted, and will be taken into consideration by the working group.

Issue 5. Whether additional criteria should be introduced to qualify a Single Character IDN TLD as an IDN ccTLD or IDN gTLD

Comments

Joseph Yee

Generic geographic terms like dot-country, dot-state, dot-street (and their equivalent in every other languages) in combination with strings at the second level may be mistaken as TLDs from authorities or countries. This may need extra attention for the policy.

APTLD

Single Character IDN TLD should not be exempted from the current restrictions on similarity to the geographic names and confusability with the ASCII character set. Single Character IDN TLD that represent a geographic name, for example, .中 (vs .中国 China should be subjected to additional restrictions as imposed by the Draft Application Guidebook for geographical names.

CDNC

The Chinese Domain Name Consortium is of the opinion that that any single-character IDN TLDs should pose no confusingly meaningful similarity to IDN ccTLDs.

Consideration of comments

Comment noted that the current distinction between IDN ccTLDs and IDN gTLD should be maintained and it is assumed that under the current rules and procedures the criteria are sufficient to qualify a string.

As noted above, comments relating to other area's of the new gTLD and IDN ccTLD's processes, for example topics of the Draft Application Guidebook version 4, have not been concluded and are taking place in other ICANN fora.

Issue 6. Whether special policies are required to address usability of Single Character IDN TLDs given existing application environments

Comments

Joseph Yee

It is suggested to initiate more outreach to application communities to bring more awareness and improve TLD/domains validation or related concerns in order to promote acceptability of IDN's

Consideration of comments

The comment is noted. As indicated in the public announcement soliciting public comments and input on the universal acceptance of IDN TLDs is considered one of the main topic areas of the JIG. The suggestion made will be considered in the context of the WG discussions of that topic area.

Annex A Submissions received

1. Joseph Yee

Affiliation: Unknown

Received 9 September 2010

2. Chuck Warren

Affiliation: Unknown

Received 9 September 2010

3. Nai-Wen Hsu

Affiliation: Chinese Domain Name Consortium

Received 10 September 2010

4. David Maher

Affiliation: Registries Stakeholder Group (RySG)

9 September 2010

5. Jian Zhiang

Affiliation: APTLD

Received: 13 September 2010

6. Louise Pennisi

Affiliation: Queensland Law Society (Australia)

Main Comment received 14 September 2010

7. Louise Pennisi

Affiliation: Queensland Law Society (Australia)

Additional Comment received 16 September 2010