

The APTLD has reviewed the initial report from the joint ccNSO and GNSO IDN working group (JIG) on the Introduction of Single Character IDN TLD dated 27 July 2010.

We would like to make the following comments to the report.

1. We believe that Single Character IDN TLD is important to various stakeholders within the Asia Pacific region, for example, the Chinese, Japanese, and Korean Internet communities. CJK has tens of thousands of characters. One CJK character has the same expressive power and the same degree of meaning distinctiveness as an ASCII string with three letters ($26 \times 26 \times 26 = 17576$). These stakeholders would be significantly marginalised if Single Character IDN TLD would not be available.
2. We are also cautious that 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 represents 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.
3. We are also aware that for alphabetic scripts other than those from CJK and ASCII, e.g. Arabic, might give rise to confusions with other strings. We welcome further careful study into this issue.
4. The current Draft Application Guidebook has allocation methods that have taken 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.

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