

CDNC Reply to the Second Draft of Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels

China Domain Name Consortium (CDNC), on behalf of the Chinese language community, thanks the IDN Variant TLD Issues Project (VIP) team (project 2.1) for publishing the second draft of Procedure to Develop and Maintain the Label Generation Rules (LGR) for public comments. It is acknowledgeable that VIP team has made significant efforts to work out universally applicable LGR procedures for different IDN language subsets. We fully understand and respect this work in conformity with the principles of Longevity, Usability, Inclusion, Simplicity, Predictability, Stability, Letter and Conservatism. We are looking forward to smooth establishment our Generation Panel of Chinese Language and efficient implementation of LGR development following the guidance of those principles for global public interests.

Nevertheless, based on our review of this draft, with reference to our community consensus-based principles for IDN variant issues and the consumer expectations, we observe the fact that these proposed procedures are too general to address many specific concerns and expectations of our community for LGR development, which leaves great unpredictability for the real implementation process.

To be specific, following the principles of conservatism and predictability, we are currently aiming to efficiently generate Chinese IDN Variants rule sets for the root zone in consistence with our previous practices, which has been widely accepted by Chinese language users. Now we see that, however, in the current draft of LGR development procedure, many issues, including the detailed formation process, validity and working schedule of the Generation Panel and Integration Panel, the factual start point of LGR generation for each language and the timing question are remained unclear or left behind to the Generation Panel or the Integration Panel to solve. In this sense, we strongly suspects that the later on process will be very time consuming. As the first IDN TLD is pending to be delegated soon in mid-2013, these unaddressed issues left behind may significantly restrict the usability of the IDN TLDs in Chinese language and our established consensus based principles.

There following notions will help to illustrate why it is so important to have Chinese variant LGR to be integrated in the root zone smoothly. It is notable that

Chinese language community has the largest IDN TLD applicant group, which filed approximately 70% of all IDN applications. Most of the applicants follow CDNC's established practices in terms of IDN table and LGR rules. The current available registration software is also most compatible to the current practices where the preferred variant domain names can be simultaneously activated as consistent to the TLD. On the other hand, variant labels are indispensable formats for Chinese Domain Names. Resolution volume for domain names with variants accounts for over 15% of the total volume according in the existing IDN ccTLDs. This fact proves that in terms of preferred variants Chinese end-users comprehend those labels as the same when inputting and reading. Therefore, to maintain the current Chinese new variant TLD to be resolvable in consistence with our previous LGR practices is very crucial to the usability of Chinese IDN TLDs. Upon Chinese IDN new gTLD delegation, if our LGR sets cannot be efficiently integrated in the root rules, many unpredictable consequences will emerge in the future. As Chinese language community has operated Chinese language domain names for more than ten years, we have already worked out very mature and fully-tested Chinese variant LGRs both at the second level and the top level. Above all, our major concern is how to smoothly integrate our LGRs in the root zone without harming the congruity of the user experience and global applicability of the root rules.

With this regard, we suggest that the current draft of LGR development procedure can be improved in 4 aspects:

1. Recognition of spontaneously formed Generation Panel based on established community internal coordinative mechanisms;

If we understand correctly, the current LGR development procedure indicates that the LGR needs to be firstly approved by the Generation Panel and then the Integration Panel. Once the Generation Panel submits its LGR proposal, the integration panel will start to evaluate the submitted LGR sets and then forward for implementation in the root if appropriate. In order to smoothly push forward our new variant TLD delegation, we are willing to establish a Generation Panel for CJK Scripts spontaneously to work out our LGR proposal based on the legacy of our previous work and established coordinative mechanism. With our comprehensive working experience on IDN variants and the long lasting coordinative mechanism in the framework of CDNC, we are confident that we can develop a LGR proposal for Chinese language efficiently. We want to make sure if this volunteer work will be acceptable within the framework of LGR development. And also we want to make sure when and how to submit our proposal to the Integration Panel. It will be helpful for the VIP team and ICANN to work out a standard guideline for propose progress.

2 More details of the Integration Panel formation and working

process

We notice that unlike the working of Generation panel, there is limited information for the Integration Panel in the draft. We anticipate that the Integration Panel will be the final decision maker for LGR inclusion, which needs more attention to its transparency and accountability. Specifically, more details should be provided on the process of the proposal evaluation and possible outputs, especially for the time schedule, participatory mechanisms, methods for simultaneously evaluating multiple proposals, detailed technical evaluation criteria, which will make the process to be more predictable. We suggest that the member of Integration Panel should be elected publicly from different linguistic groups. And the decision makers should serve this function in a fixed term and subject to reelection when their term is over. Moreover the integration panel should also have proved understanding to the language on which the proposal they are going to evaluate.

3. Starting points for the CJK panel

We acknowledge that this LGR procedure is generally applicable for all languages. On the other hand, we also recognize that this draft also provide specific cases of different language panels and their start point of label generation in order to avoid further duplicated work or explanations. With regard to the common usage of our two writing system as simplified Chinese (SC) and Traditional Chinese (TC) in our community, the Preferred Variants label generation rules are highly compatible to Chinese language use, which is also in conformity with the rules listed in the main text body and Appendix F. The LGR of Preferred Variants and the ultimate delegation of these preferred variants are so crucial for our cultural integrity, user experience and structural stability, which therefore are our bottom principles for in terms of label generation. Although we understand that this might be further discussed in the generation panel, we contend that our practices of Preferred Variants should be included as the starting point as the default practices for Chinese language. This starting point can be put in appendix F.

4. Timing Issues

As the schedule of IDN variants project plan shows, the implementation of LGR will start in April 2013, therefore, we are supposed to establish the CJK Generation Panel now and the Integration Panel should be prepared to work in April this year. The current procedure has not indicate the necessary timeline for establishing the panels and the estimated time it may required for evaluation of the Integration

panel, which result in great uncertainty of the real implementation time. These concerns should be forwarded to ICANN to promote effective move forward.

About CDNC

Chinese domain name consortium (CDNC) was set up in Beijing in 2000 by CNNIC, TWNIC, HKNIC and MONIC. As an independent non-profit organization, CDNC is responsible for the coordination and regulation of Chinese domain name policies around the world. Since the domestic domain name plays a more important role in China, organizations and companies have increasingly shown interests and have been actively joining in the research and popularization of Chinese domain name. CDNC will evaluate all Chinese domain name compliance with international criterion. CDNC will also establish the standards for Chinese domain name and corresponding regulation on Chinese domain name registration. In addition, CDNC coordinates the operations and management of Chinese domains in various countries or regions, communicates and collaborates with all corresponding international organizations on Chinese domain names such that CDNC is well positioned to develop international standards to meet future needs.

For more information, please visit us at: www.cdnc.org.