Report of Public Comments

Title:	Draft Final Report of the Internationalized Registration Data Working Group
Publication Date:	TBD
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Comment Period:		Important Information Links
Open Date:	03 October 2011	**Announcement**
Close Date:	17 November 2011	**Public Comment Box**
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Section I: General Overview and Next Steps

ICANN is seeking public comments on the draft Final Report of the joint SSAC-GNSO Working Group on Internationalized Registration Data (IRD-WG). This draft Final Report studies the feasibility and suitability of introducing display specifications to deal with the internationalization of registration data and finds that it is feasible to introduce submission and display specifications to deal with Internationalized Domain Name Registration Data and recommends a series of next steps that could be undertaken to address further the technical and policy issues identified in this report, including a recommendation that the GNSO Council request an Issue Report on the policy questions raised in this report. Following the close of this comment period, the IRD-WG, will discuss and consider all of the comments received and prepare a Final Report, which will then be considered by both chartering organizations, the SSAC and the GNSO Council.

Section II: Contributors

At the time this report was prepared, four (4) community submissions had been posted to the Forum. The contributors are listed below with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Affiliation (if provided)	Initials
Claudio DiGangi	Domain Disputes and Whois Subcommittee of the INTA Internet Committee	INTA
Jerry Upton	Messaging Anti-Abuse Working Group (MAAWG)	MAAWG
At-Large Advisory Committee Staff	At-Large Advisory Committee (ALAC)	ALAC

Individuals:

Name	Submitted by	Initials
Alessandro Vesely	Alessandro Vesely	AV

Section III: Summary of Comments

INTA expressed its appreciation of the work of the IRD-WG and agreed with the recommendations of the IRD-WG that further study and recommendations would be beneficial. INTA urged that such work that may result from the recommendations should be conducted expeditiously to provide direction and stability for the evolving Internet landscape, namely, implementation of the impending unrestricted Generic Top Level Domain (gTLD) Program, including the introduction of internationalized domain names as gTLDs, when the application window opens on January 12, 2012. In particular, INTA strongly agreed with the IRD-WG's recommendation that the Data Model should include language tags with the published registration data, regardless of the model ultimately chosen. INTA also supported the preparation of a common issues report on translation, transliteration or transcription of contact information at the request of the GNSO Council and SSAC. Finally, INTA supported the proposal for further study and recommendations to address the unresolved policy issues related to the feasibility and suitability of internationalized domain name registration data.

The MAAWG directed its comments specifically to the findings and recommendations of the IRD-WG Draft Final Report as follows:

Finding 4.1 re: "Is It Suitable To Internationalize Domain Name Registration Data?" the MAAWG agreed that the competing requirements described by the Working Group need to be balanced. However, the MAAWG emphasized that its primary concern is maintaining the global usability of domain name registration data throughout the Internet and that the convenience of an individual domain name registrant constitutes a distinctly lower, secondary priority.
Finding 4.2 re: "What Data Elements Are Suitable To Be Internationalized?" the MAAWG agreed with all of the recommendations except for one. In particular, the MAAWG objected to, and did not endorse, the recommendation of the working group for Entity Names and Addresses, as according to the MAAWG the recommendation appears to potentially allow these to be entered solely in the user's local language and script.
Finding 4.3 re: "Is It Suitable To Support The Translation Or Transliteration of Entity Name and Contact Information Into a Single Script / Language?" the MAAWG urged that entity name and contact information be made available in English using 7-bit ASCII characters, in addition to any other local language or script that might be used.
Finding 4.4 re: "Is It Suitable To Introduce Display Specifications To Address Internationalized Domain Name Registration Data?" the MAAWG stated that it favors efforts at WHOIS standardization and does not object to the working group's recommendations in this section, although it was concerned about the potential for abuse that may be introduced by data-element-level language and script tagging.
Finding 4.5 re: "Is the Current WHOIS System Capable of Handling the Query and Display of Internationalized Registration Data?" the MAAWG said was the most important operational issue raised by the ICANN working group in their report. With respect to this Finding, the MAAWG agreed that it is an extremely urgent issue.
Finding 4.6 re: "Is it Feasible To Introduce Submission and Display Specifications to Address with Internationalized Registration Data?" the MAAWG did not object to the further consideration of these IETF and Universal Postal Union standards for address standardization purposes.
Recommendations: The MAAWG indicated that it did not object to the three recommendations made in the

Draft Report, subject to the considerations outlined earlier in these comments.

The ALAC stated that it endorsed the three recommendations of the IRD-WG draft Final Report and adopted them to its framework of principles intended to promote and safeguard the public interest. The ALAC emphasized that the recommendations reinforce its own commitment to support mechanisms that nourish accountability at every level of the Internet ecosystem, specifically those which provide some measure of assurance that all actors in the internet ecosystem can be addressed for redress of grievance.

AV expressed interest in the four models described at the end of the Draft Final Report. (See Appendix B: Different Models that IRD-WG Considered for Internationalizing Contact Information, page 21.) However, AV noted that the concept of a "must be present" representation is ill-defined. In place of the "must be present" concept, AV suggests a "may be present" approach as described in the analysis below, which would permit ASCII to the extent allowed by local regulations and policies, and provide transliteration/translation of specific terms.

Section IV: Analysis of Comments

> *General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.*

The Internationalized Registration Data Working Group (IRD-WG) reviewed the comments and produced the following brief analysis.

The IRD-WG thanked the INTA and ALAC for their support of its recommendations. The IRD-WG also agreed with INTA that follow-up work needs to be done expeditiously.

Regarding comments from AV about "must be present" the IRD-WG agreed with the commenter, and will add clarifications in the document about what "must be present" means.

Regarding MAAWG's Findings 4.2: "In particular, the MAAWG objected to, and did not endorse, the recommendation of the working group for Entity Names and Addresses, as according to the MAAWG the recommendation appears to potentially allow these to be entered solely in the user's local language and script." The WG have discussed this extensively, and the point of view that MAAWG raised here has been raised before and considered in WG discussions. Note, on this issue, the IRD-WG could not reach consensus and agreed that an issues report should be created as a next step.

Regarding MAAWG's Findings 4.3: The IRD-WG could not reach consensus and agreed that an issues report should be created as a next step. It appears to the IRD-WG that what the MAAWG is advocating is model 1.

Regarding MAAWG's Finding 4.4: "the MAAWG stated that it favors efforts at WHOIS standardization and does not object to the IRD-WG's recommendations in this section, although the MAAWG was concerned about the potential for abuse that may be introduced by data-element-level language and script tagging." The IRD-WG disagreed with MAAWG that without element level tagging it is not possible to identify what language / script the data is in.

Regarding MAAWG's Finding 4.5: The IRD-WG agreed with commentator that this is an urgent issue that needs to be addressed.