DATE: 2010-04-11

TO: ICANN

FROM: Zhang Zhoucai, Individual Expert in China

Subject: Synch ccTLD for China

Dear ICANN,

My name is Zhoucai Zhang, the former Convener & Chief Editor of CJK-JRG (1990-1993), WG2 Contributing Editor & IRG Rapporteur for ISO/IEC 10646-1:2000, 10646-2:2001 and 10646:2003. I am pleased to see the Proposed Implementation Plan for Synchronized IDN ccTLDs, and would like to offer my support as well as my comments to the proposal.

I understand from web that ICANN launched Fast Track Implementation Plan for IDN ccTLDs on Nov. 16, 2009. There are limitations in the IDN FT Implementation Plan, which did not address Simplified and Traditional Chinese character issue in China's IDN ccTLDs. While the Proposed Implementation Plan for Synchronized IDN ccTLDs has provided a solution to China and all other countries/regions that have the same need like the one existed in Chinese communities.

Inclusion of both Simplified and Traditional Chinese character subsets in China's IDN ccTLD Strings is essential to Chinese language culture. Although majority of Chinese write Simplified Chinese characters, however, MILLIONS of other Chinese people, including many elderly Chinese people in mainland and those Chinese from Taiwan, Hongkong, Macau and overseas countries are using Traditional Chinese character as a subset of Chinese character set.

One term, maybe consists of a character string from Simplified subset or Traditional one. But the different forms (the SIGNIFYING) represent the same object (the SIGNIFIED). Especially, the TLD".中国"and its traditional form ".中國" are exactly the same without any ambiguity. In practice, it is very likely for people to key in the two different forms of TLD into the browser address bar, therefore they should be resolvable to the same address. Now, variety of available Chinese input methods support Simplified or/and Traditional Chinese subsets, and the switching between Sim. and Trad. Mode are very convenient and widely used.

For these reasons, In China's IDN Strings, it is wise to have both Simplified and Traditional TLD co-registered and co-exist as single domain name. It is a significant step ICANN has undertaken to resolve IDN ccTLD issues in specific language communities where urgent needs exist and has been justified. This is crucial to a successful IDN ccTLD development.

From my working experience with Chinese Characters, standards evolve over time to

meet the need of natural language development. It is an important for ICANN to make IDNs available to non-Latin speakers and allow easy access to the Internet from local people in their native languages. There may be more issues coming along in the future IDN path. However, with the Proposed Implementation Plan for Synchronized IDN ccTLDs, I am hoping that ICANN is up to the challenge ahead and work hard to bring a secure, reliable, resilient and vibrant internet experience to every corner of the globe.

The best regards,

Sincerely yours,

Zhang, Zhoucai

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