Comments on DAG 6 by CNNIC

China Internet Network Information Center (CNNIC) congratulates ICANN on the progress made in the new Draft Application Guidebook. As an intended applicant of Chinese TLDs, CNNIC would like to take this opportunity to make a few comments on issues afflicting IDN communities throughout the process, which is yet properly addressed at DAG 6.

1. On Chinese Variants issue

We understand ICANN attach great importance to IDN variants issue and have instructed the formation of VIP WG to find a management mechanism to solve the issues. But we would like to point out here that the timetable is unfavorable for IDN variant applicants if they want to apply for an IDN TLD in the first new gTLD application round. We would like suggest ICANN VIP group expedite the process so that the variant issue could be properly addressed and treat the variant issue on a case by case and first-done-first-serve basis to meet the demand of potential applicants.

In fact, Chinese language community and technical community have been involved in finding solutions to Chinese variants for over a decade. Based on registry operation experience, Chinese TLD operators have developed a concrete and feasible solution to cater to the needs of Chinese users worldwide. Chinese solutions have been fully tested out by the delegation and operation of Chinese IDN ccTLDs, namely ".中国/.中國", ".台湾/.臺灣", ".香港" and ".新加坡". To date, registries have not received any complaints with regard to the variant management and no abuse of variant domain names is reported. Chinese Domain Name Consortium has produced a detailed report on Chinese experience in this regard last year on its [letter to ICANN](). CNNIC reckon the work has been done by Chinese community will serve as a good foundation for VIP WG.

2. On single-character IDN TLDs

As commented before, CNNIC welcomes allowing IDN single character TLDs into the market. We would like to point out that single Chinese character string often shares similar meaning with a two-character Chinese string, and some single Chinese Characters are used by Chinese people as acronyms to refer to geographical names or other specific noun phrases. DAG6 might address it to avoid users' confusion. Moreover, single Chinese characters also have variant issue.

In view of this, CNNIC would like suggest ICANN take a comprehensive consideration to the IDN variants issue and single-character issue in the application guidebook.

Thanks again for your consideration.