



December 15, 2015

Via Electronic Mail

comments-lgr-second-level-05nov15@icann.org

Re: Guidelines for Developing Reference Label Generation Rulesets (LGRs) for the Second Level

Google Registry appreciates the opportunity to comment on ICANN's Proposed Guidelines for Developing Label Generation Rulesets (LGRs) for the Second Level.

We do not specifically oppose any of the steps or processes proposed for the development of LGRs for the second level. However, the guidelines must not create an expectation that registries will be required to implement the reference LGRs and operate standardized Internationalized Domain Name (IDN) tables. The outputs of this process should be limited to guidelines that registries or other entities *may* rely upon in developing their own rulesets.

The proposed process notes that the target repertoire of reference LGRs would fall between the core subset and extended subset, rather than the full set of code points that could be used in writing a particular language. As such, a registry's IDN tables could reasonably include code points that were used in a particular language, but that did not feature in the reference LGR. As long as their tables comply with RFCs and other relevant technical requirements, registries should not be prevented by ICANN from using IDN tables, regardless of whether they accord with the reference LGRs during Pre-Delegation Testing, Registry Service Evaluation, compliance monitoring, or any other process.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Duchesneau".

Stephanie Duchesneau
Domains Policy and Compliance