

14-Dec-2015

Dear ICANN,

Please find attached our comments pertaining the announcement for public comments: "[Guidelines for Developing Reference LGRs for the Second Level](#)"

*Sincerely Yours,  
Raed Al-Fayez*

# Comments on

## Guidelines for Developing Reference LGRs for the Second Level

Date: 2015-12-14

### Page 1, Line 6:

"The intent is to allow registries to adopt these LGRs either as is, or to take them as the basis for further modifications"

#### Comment:

As ICANN is entitled to put policies and guidelines for gTLDs but certainly not for ccTLDs. The document should clearly state its scope of implementation (i.e., at the gTLD registry level). Therefore, it is recommended the above text changed to:

*"The intent of the document is to list a set of recommendations (or guidelines) to be implemented/adopted by gTLD registries.*

### Page 2, Line 10:

Section: "Subsets of Code Points Used in Writing a Language"

#### Comment:

Please note that as we are dealing with a technical label (not writing an article or poem) we should be careful and conservative (due to security issues as well as universal acceptance) in supporting code points in domain names that are not essential. Thus, we strongly believe that we should adhere to the LDH concept, and therefore, code points that does not comply with the LDH concept and not essential in writing systems should not be added. For example (not conclusive), in the process of developing the target repertoire for a given LGR, the following group of code points should not be included:

- Code points that represent lexical words or phrases.
- Code points that represent non-spacing marks (that are not used to form a letter).
- Code points that are not PVALID by IDNA 2008 protocol.
- Code points that have some security, stability, usability, or reachability issues.
- Code points that are not essential characters for writing a language, such as:
  - o An optional mark
  - o A formatting character or mark
  - o A punctuation mark
  - o An honorific mark or symbol
  - o A mathematical symbol"
  - o A technical sign, such as encountered in religious texts
  - o An invisible control characters.

### Page 6, Line 1:

Section: "Development Process"

#### Comment:

- Again, as we are dealing with a technical label (not writing an article or poem) we should be careful and conservative (due to security issues as well as universal acceptance) in supporting code points in domain names that are not essential. Therefore, the development process should start with the set defined by the Root Zone LGR Project and add to it the necessary and essential code points needed that are not supported by the Root Zone LGR.

- For Step 2 you may add also (for Arabic script) the support of ARABIC-INDIC Digits & EXTENDED ARABIC-INDIC Digits.

#### Page 7, Line 1:

Section: "TARGET VARIANT SET"

##### Comment:

We believe that the process to develop the target variant set should be done in a bottom-up approach, i.e., we start at the language level and then carry out to the script level. In other words, the outcomes for this stage should be a set of tables describing the code points and their variants for each supported language and then a master combined table for all languages at the script level. This will help registries to better manage registration process by including only language tables for languages that they support and do the protection based on the script master combined table.

#### Page 7, Footnote 4:

<sup>4</sup> except in a few cases, such as Arabic, where it is not expected to be part of the repertoire "

##### Comment:

This footnote is not clear to us as we (a registry for one of the Arabic language IDN TLD) are widely using the "hyphen" as a word separator. Henceforth, in the domain name context, a "hyphen" is used as a word separator in the Arabic language instead of a "Space" which is not permitted in domain names.

#### Page 8, Line 2:

Section: "Linguistic Review "

##### Comment:

As we are dealing with a technical label (not writing an article or poem) where we only cover the necessary and essential code points and observe the balance between the language support and the security issues as well as universal acceptance. It is strongly recommended that the expert reviewers should have the balance between the language needs and user acceptance. This is also true for the final outcomes of this process (i.e., it should draw the balance between the language need and user acceptance). As for example, a linguist may recommend some resolutions that may cause some security risks, and this should be avoided. Therefore, in order to balance the outcomes of this project we believe that the team who will participate in this project should include experts with balanced participation from different backgrounds, such as:

- Language communities,
- Registries,
- Registrars, and
- DNS Security

#### Page 8, Line 29:

Section: "DNS Security and Stability Review"

##### Comment:

Feedbacks and inputs from current IDN registries (either ccTLD or gTLD) are very important in this phase and they need to be consulted for their experiences in managing their registries for the past 5 years.