

In the capacity of a neutral party whose interests are in the study of the spread of multi-lingual Internet use, I would like to share with you some key facts and figures as this relates to domain names; and why I strongly urge ICANN to accept Verisign's amendment to the TMCH RPM section 2.2.4.

Full native language domain names are key to the success of developed and undeveloped nations as they strive for a fully localized web experience.

*A review of the COM zone file, shows the following:

- 725,000 IDNs are currently registered across the 9 languages for which Verisign has applied for a new gTLD transliteration of "com"
- Among this subset of IDNs, there are approximately 190,000 unique registrants

Verisign has proposed that in the interest of avoiding user confusion, only existing registrants of an IDN can register an equivalent new transliterated "com".

This proposal is currently not permitted under the current TMCH RPM, hence their suggestion for amendments.

Should the rules not be changed, and the release mechanism of new transliterated "com" names be registered to parties other than the current registrants, then we foresee a huge opportunity for confusion and fraud, that will most likely result in rejection of IDN by end-users globally across the web.

The establishment of a rights protection mechanism is important, but what is clear here, is that these "paired" gTLDs should actually have been treated differently, rather than being forced into a one-size-fits-all policy & rule set that was clearly designed for new gTLDs that have no legacy "pairs".

Many global brands already own their IDN, i.e:

Шанель.com Chanel, Inc.
シスコシステムズ.com Cisco Technology, Inc.
קוקהקולה.com Coca cola
香港迪士尼乐园.com Disney Enterprises, Inc.
이베이.com eBay Inc.
ایسون.com Seiko Epson Corporation
エステローダー.com Estee Lauder, Inc.
富士通.com Fujitsu Limited
谷歌.com Google
日立.com Hitachi, Ltd
איקאה.com Inter Ikea Systems B.V.
インテル.com Intel Corporation
우체국보험.com Korea Post
교보생명.com Kyobo Life Insurance, Inc.
路易威登.com Louis Vuitton Malletier
마이크로소프트.com Microsoft
오라클.com Oracle Corporation
פפסי.com PepsiCo, Inc
פיליפס.com Koninklijke Philips N.V.
Порше.com Porsche

Ролекс.com Rolex S.A.
스타벅스.com Starbucks Coffee Korea Co.,Ltd
東芝.com Toshiba Corporation
월마트.com Wal-Mart Stores, Inc.
اهوى.com Yahoo!, Inc

- to name but just a few.

Unlike ASCII domain names, cybersquatting of IDNs in the com space is infrequent, with only 40 WIPO and 11 ADR UDRP cases recorded to date.

With IDN domains in the root for over 10 years now, there has already been (in essence) a Sunrise period for over a decade, as the UDRP process has been working just fine for IDNs since they were first released by Verisign 13 years ago. This alone suggests that these “paired” gTLDs have little to gain by being forced through a new Sunrise period (the Sunrise period will give little protection to those businesses and individuals that do not have a Trademark); but an awful lot to lose should the existing consumer base of 190,000 registrants be denied the opportunity to extend their domain name to a full IDN, and then have to deal with the cybersquatters and fraud that will inevitably come when 2 identical sounding domain names enter the zone file but under the control of two different entities.

To be clear, I have no alliance with Verisign, in fact this very same scenario exists for the “paired” gTLDs that PIR have applied for (.org transliterations) – however due to the proliferation of com, this issue has the ability to derail the trust in all IDN use, current and future, regardless of gTLD or registry.

In conclusion, it is critical that owners of IDN .com receive an equivalent new transliterated “com”.

* findings from a conservative analysis of the COM zone file conducted February 2013.
190,000 unique email addresses associated with domain names in scripts for which Verisign has applied for a new TLD. The actual number of registrants will be higher as this number does not include domain names under whois privacy.