

CDNC concerns on IDN policy requirement on New gTLD draft guideline

Chinese Domain Name Consortium (CDNC, <http://www.cdnc.org>) welcomes the publishing of the draft "New gTLD Applicant Guidebook" (the Guidebook) by ICANN for public comment. CDNC believes that the Guidebook demonstrates good advancement towards IDN gTLDs and congratulates ICANN on the progress. However, CDNC would like to express a significant concern regarding Section 2.1.1.3.2 String Requirement (Module 2, page 2-7) in the Guidebook, which said: "Policy Requirements for Generic Top-Level Domains – Applied-for strings must be composed of three or more visually distinct letters or characters in the script, as appropriate", where a limitation on the minimum number of characters for an IDN TLD string is introduced.

In the case of Chinese IDN TLDs, the limitation to 3 or more Chinese characters would be a substantial deterrent for the adoption of Chinese IDNs. Most Chinese words are composed of 2 Chinese characters. And if such limitation is set on Chinese strings, it is impossible to form a meaningful 3-character string in Chinese. Also, the limitation on number of characters in the IDN TLD string does not represent the interest of the community that CDNC serves, and will create significant impact on stakeholders in IDN business and user communities as a whole. From our experience with IDNs, our participation throughout the technical standards development process at IETF, policy discussions at GNSO on this topic, as well as at the IDNC Fast-Track IDN ccTLD discussions, there is no indication of any reason to limit the minimum number of characters applicable for Chinese IDN TLDs.

We refer to the GNSO Final Report suggesting that: Single and two-character U-labels on the top level and second level of a domain name should not be restricted in general. At the top level, requested strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language used in order to determine whether the string should be granted for allocation in the DNS.

Hence, CDNC suggests removing or modifying the following paragraph in Module 2, section 2.1.1.3.2 page 2-7 of the guidebook to meet the special situation for the Chinese language: Policy Requirements for Generic Top-Level Domains – Applied-for strings must be composed of three or more visually distinct letters or characters in the script, as appropriate.

CDNC respectfully urges ICANN and ICANN staff to consider the suggestion by CDNC and to uphold the policy recommendation on this regard by the GNSO, taking into account the interests of our community.

Chinese Domain Name Consortium
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