Summary and Analysis of Public Comments for:

Interim Report of the Internationalized Registration Data Working Group

Comment period ended: 14 March 2011

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I. BACKGROUND

On 26 June 2009 the Board of Directors of the Internet Corporate for Assigned Names and Numbers (ICANN) approved a resolution (2009.06.26.18: <http://www.icann.org/en/minutes/resolutions-26jun09.htm#6>) requesting that the Generic Names Supporting Organization (GNSO) and the Security and Stability Advisory Committee (SSAC), in consultation with staff, convene an Internationalized Registration Data Working Group (IRD-WG) comprised of individuals with knowledge, expertise, and experience in these areas to study the feasibility and suitability of introducing display specifications to deal with the internationalization of registration data.

The Board further directed the IRD-WG to solicit input from interested constituencies including country code top level domain (ccTLD) operators and the Country Code Names Supporting Organization (ccNSO) during its discussions to ensure broad community input. Subsequently, the SSAC and the GNSO formed the IRD-WG.

This Interim Report of the IRD-WG summarizes the discussions of the IRD-WG to date, provides preliminary recommendations, and seeks input from the community on the following questions relating to internationalized registration data:

1. Which of the four models described in Section 4 for internationalizing registration contact data is most appropriate, if any? Are there other models the IRD-WG should consider?

2. Which of the preliminary recommendations in Section 5, if any, are feasible? Are there related recommendations the IRD-WG should consider?

The Interim Report provides the community with an opportunity to understand ongoing discussions relating to the internationalization of registration data and to provide valuable input to these discussions. At the direction of the IRD-WG, staff posted the Interim Report for public comment for a period of 60 days.

Document Links: Interim Report of the ICANN Internationalized Registration Data Working Group:

- English [PDF, 688 KB]
- العربية [PDF, 572 KB]
- 中文 [PDF, 572 KB]
- Français [PDF, 552 KB]
- Русский [PDF, 724 KB]
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II. GENERAL COMMENTS & CONTRIBUTORS

The public comment period was opened on 15 November 2011 and closed on 14 March 2011. At the time this summary was prepared, a total of eight community submissions were posted to the forum. The contributors are listed below in chronological order by posting date (with initials noted in parentheses). The initials will be used in the foregoing narrative to identify specific quoted contributions.

* Dr. Sarmad Hussain (SH)
* John C Klensin (JCK)
* Paul Diaz on behalf of Network Solutions (NS)
* Rod Rasmussen on behalf of Internet Identity (IIT)
* David W. Maher on behalf of Registries Stakeholder Group (RySG)
* Steve Metalitz on behalf of Intellectual Property Constituency (IPC)
* Claudio Digangi on behalf of the Domain Disputes and Whois Subcommittee of the Internet Committee of the International Trademark Association (INTA)
* Matthias Langenegger on behalf of the At-Large Advisory Committee (ALAC)

III. SUMMARY & ANALYSIS

This document is intended to broadly and comprehensively summarize the comments of the various contributors to this forum but not to address every specific argument or position stated by any or all contributors. The Staff recommends that readers interested in specific aspects of any of the summarized comments or the full context of others refer directly to the specific contributions.

A. Summary of Comments by SH

The comments from SH are grouped in two categories: 1) comments on the four models and the WHOIS service and 2) a proposal for a new model.

1. Comments on the Four Models and the WHOIS Service

SH noted that in principle the registrant is the owner of the internationalized registration data (IRD) and the registrar is maintaining the data on the registrant's behalf. SH emphasized that if the registrar provides translation or transliteration –- not the registrant -- the integrity of the data is violated and accuracy and consistency problems will be created. SH noted that his situation would occur for models 3 and 4.

SH further noted that a monolingual registrant could only be expected to provide IRD in a single language and could not verify the translation or transliteration of the data being provided in a "must-be-present" script. SH added that this problem would occur with models 1, 3, and 4.

In addition, SH noted that internationalized registration data should follow the internationalized domain name protocol specifications, and specifically the stipulation of the registry. This is possible if the language table and rules published by the registry are also used by the registrar to verify internationalized registration data.

Finally, with respect to the WHOIS service, SH asked if the service returns the variants, should it also tell the status of each variant -- reserved,

blocked, allowed, primary -- as requested by the registrant and maintained by registry? Also, SH noted that it is not clear from the Interim Report what the benefits or reasons are for the WHOIS service to return the U-label, and why it is not left to the WHOIS client. In addition, SH asked why shouldn't the WHOIS service only return the A-label?

2. A Proposal for a New Model

SH proposed a new model under which registrants would provide the data in the script and language of their choice and specify the language (locale(?)) of the data. This model would not require transliteration or translation of internationalized registration data. Thus, in this proposed model any individual or organization that needs the data for legitimate use can access it and if needed transliterate or translate the data based on the language information provided by the registrant.

B. Summary of Comments by JCK

The comments from JCK are grouped in five categories: 1) confusion about terminology; 2) protocol development responsibility; 3) non-contact registration information; 4) contact information; and 5) other issues.

1. Confusion about Terminology

JCK noted that the base definition of internationalized domain name (IDN) should be on IDNA 2008, not IDNA 2003. JCK further noted that the report should consider the difficulty concerning definition of a variant and avoid adding to the confusion.

2. Protocol Development Responsibility

JCK commented that ICANN should not do protocol development. JCK added that IRIS would address many of the query and retrieval issues raised in the Interim Report. Thus, in his opinion the IRD-WG should analyze why IRIS was inappropriate or provide a more extensive analysis of features that would be needed in a different protocol to replace or supplement WHOIS.

3. Non-contact Registration Information

JCK noted that: 1) ISO 8601 can be considered for internationalizing dates, 2) RFC 5335 is not appropriate for internationalizing email addresses in the report, and 3) There is no requirement for ccTLDs using extensible provisioning protocol (EPP), thus it is not feasible to use EPP to uniformly indicate registration status.

4. Contact Information

JCK noted that the report should consider Universal Postal Union (UPU) recommendations (particularly S42 templates) or ISO Standards for transliteration of characters from scripts.

5. Other Issues

According to JCK ICANN should consider the difficulty of defining a variant and should avoid adding to the confusion. JCK also noted several editorial issues with the report.

C. Summary of Comments by NS

NS recommended that the IRD-WG should consider the new model proposed by SH. NS contends that its benefits include being simple to implement while also shifting translation or transliteration responsibilities to those who want to use internationalized registration data. NS also noted that the four models presented in the Interim Report did not include a role for registry operators. NS suggested that a new model should include registry operators as active partners in ensuring the consistency and quality of internationalized registration data. Finally, NS noted that that there needs to be more discussion of translation and transliteration tools if the community is required to use them in any of the models.

D. Summary of Comments by IIT

The comments from IIT are grouped in two categories: 1) requirements for the "Must be present" script and 2) general comments.

1. Requirement for the "Must be Present" Script

IIT noted that industry organizations and international law enforcement agencies share similar experiences and uses for WHOIS data. IIT argued for a solution that includes the requirement for a "must be present" script, and to the extent possible, this requirement should be accurate and consistent between various top level domains (TLDs). In support of its argument, IIT noted that the requirement for a "must be present" script – particularly American Standard Code for Information Interchange (ASCII) -- would enable correlation across the WHOIS services in various TLDs and assist in identifying criminal abuse. In addition, ASCII-based data would enable automatic notification to quickly alert website owners and others of possible abuse. Finally, a consistent "must be present" script would enable the data to be used internationally – not just locally.

2. General Comments:

IIT noted that any methodology that is chosen to display internationalized registration data needs to be as universally consistent as possible in order to provide the most benefit to everyone in the ecosystem. Also, the registry for a TLD is likely the logical place to implement standards. In addition, IIT noted that large distributed systems for handling identification of people and places around the world already exist, particularly in the postal and parcel delivery systems. ITT urged the IRD-WG to leverage standards and techniques that already exist to manage internationalized data.

E. Summary of Comments by the RySG

The RySG urged continuing work with community stakeholders to provide an analysis of current practices, especially in ccTLDs. The RySG also suggested that the IRD-WG should provide a clear definition of "Internationalized Registration Data" and "Registration Data containing non-ASCII character sets."

Regarding the data, the RySG agreed with the following specifications with respect to requirements in the current Registrar Accreditation Agreement (RAA, noted in parentheses):

1. Domain names (RAA 3.3.1.1): WHOIS services should return both A-label and U-label representation for the given IDN domains queried.

2. Name server names (RAA 3.3.1.2): To the extent technically possible names should be displayed in ASCII and the corresponding U-label.

3. Sponsoring Registrar (RAA 3.3.1.3): This should always be available in ASCII to aid law enforcement and intellectual property investigations. To the extent possible, it should also be available in local language and script.

4. Telephone/Fax (RAA 3.3.1.7,8): This should always be available in ASCII and in internationally recognized notation.

5. Email address (RAA 3.3.1.7,8): This should always be available in ASCII and to the extent technically possible names should be displayed in the corresponding U-label.

6. Dates (RAA 3.3.1.4,5): These should always be available in ASCII and the IRD-WG should address the internationalized of this field.

7. Registration Status: This should always be available in ASCII.

8. Entity names and Address (RAA 3.3.1.6,7,8): These should always be available in ASCII where non-ASCII registration data (translation or transliteration) is optional, and acceptable by the registrars and the registries.

F. Summary of Comments by IPC

The IPC noted that historically, the WHOIS data has been available in a form of ASCII script and that there would be considerable benefits in maintaining the continuity of this access in ASCII form. The IPC also noted that internationalization is most likely to change rather gradually, so it may be feasible to maintain the requirement for registrant contact data to appear in a "must be present" script for an extended period (model 1 in the IRD-WG Interim Report). However, the IPC added that there might be difficulties with this approach as a longer-term solution. The IPC also suggested that another possible approach could be to combine model 1 and model 3, including a requirement to display of registrant contact data in ASCII script, but that this could be achieved in a variety of ways. With respect to models 2, 3, and 4, the IPC noted that these would present considerable compliance challenges for ICANN because these would require the registrar (or registry) either to identify a reliable point of contact for transliterated non-ASCII registered contact data, or to actually undertake translation or transliteration of this data itself. Finally, the IPC also agrees with some commentators that other models should be considered.

G. Summary of Comments by INTA

The INTA recommended a modified version of Model 4 that would include the requirement for a language tag to be added to the published registration data so that a third party can identify the language using the language tag and more easily obtain an independent translation of the registration data. If the language tag does not accurately identify the language of the registration data, then the INTA suggested that a mechanism should be provided for the correction of the language tag by the Registrar or for the

provision of a translation of the registration data by the Registrar. According to the INTA, model 2 is the least desirable option.

The INTA noted that Model 4 as modified would provide benefits to the international community in that the registration data could be published in more languages. The INTA also noted that Model 1, which requires the publication of data in a "must be present" script such as ASCII, is an acceptable alternate model. Finally, regarding the two preliminary recommendations of the IRD-WG, the INTA in principle agreed with the broad concepts of the preliminary recommendations, advocates openness and accessibility of WHOIS data, and welcomes technical proposals from the community for implementing these recommendations.

H. Summary of Comments by the ALAC

The ALAC noted that the WHOIS was historically designed as a tool to facilitate coordination in order to find the contact person responsible for the domain name for administrative and technical problems. The ALAC further noted that while the uses of the WHOIS now extend beyond what it was originally designed to be, there is continuous debate within the community about what information should be provided by WHOIS and what should not be. The ALAC stated that in principle the WHOIS should provide as much useful information as needed, but no more. Given this principle, the ALAC recommended that contact information should be provided in a "must be present" script such as ASCII. The ALAC added that the transliteration should not be mandatory. Thus, the ALAC endorsed the proposed Model 1: that it should be a requirement for contact information to be provided in US-ASCII whereas local script can be provided optionally.

IV. NEXT STEPS

This Summary & Analysis document will be shared with the members of the IRD-WG.