

# Report of Public Comments

|  |   |  |
|--|---|--|
| <b>Title:</b>  | <b>Second Annual IDN ccTLD Fast Track Process Review</b>  |  |
| <b>Publication Date:</b>   | 4 June 2012   |  |
| <b>Prepared By:</b>  |   |  |
| <b>Comment Period:</b>   |   | <b>Important Information Links</b>   |
| Open Date:   | 9 April 2012  | <a href="#">Announcement</a>   |
| Close Date:  | 21 May 2012   | <a href="#">Public Comment Box</a>   |
| Time (UTC):  | 23:59   | <a href="#">View Comments Submitted</a>  |
| <b>Staff Contact:</b>  | Naela Sarras  | <b>Email:</b> <a href="mailto:naela.sarras@icann.org">naela.sarras@icann.org</a> |
| <b>Section I: General Overview and Next Steps</b>  |   |  |
| <p>The Final Implementation Plan for the Fast Track approved by the ICANN Board requires that the process undergo review annually. Comments received during the second annual IDN ccTLD Fast Track Process Review have been compiled into the following report and will be taken into consideration when recommending future changes to enhance the process.</p>   |   |  |
| <b>Section II: Contributors</b>  |   |  |
| <p><i>At the time this report was prepared, a total of five (5) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.</i></p> |   |  |
| <b>Organizations and Groups:</b>   |   |  |
| <b>Name</b>  | <b>Submitted by</b>                                       | <b>Initials</b>  |
| Registries Stakeholder Group   | David W. Maher  | RySG   |
| The European Registry of Internet Domain Names   | Giovanni Seppia   | EURid  |
| Bulgarian Association UNINET   | Iliya Bazlyankov  | UNINET   |
|  |   |  |
| <b>Individuals:</b>  |   |  |
| <b>Name</b>  | <b>Affiliation (if provided)</b>                          | <b>Initials</b>  |
| Petko Kolev  |   | PK   |
| Panagiotis Paspiliopoulos  | Hellenic Ministry of Infrastructure, Transport & Networks | PP   |

### Section III: Summary of Comments

*General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. 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 at the link referenced above (View Comments Submitted).*

**(PK)** The comment suggested a loss of interest from the community in IDN issues. The commenter stated that for countries whose string did not successfully complete the technical evaluation by the DNS Stability Panel, the process should clearly state that unsuccessful DNS Stability Evaluation of the requested string leads to the termination of the process.

**(RySG)** This comment contained a number of points:

1. Based on the results of first annual review of the process, commenter recommended continuing with an annual review period; if changes were to be made, ICANN should explain the set of reasons that lead to them.
2. A suggestion for ICANN staff to conduct a survey among the IDN ccTLD applicants and operators in order to generate qualitative and quantitative analysis of IDN availability and acceptance for the benefit of the community.
3. From a financial perspective, the commenter noted the amount received versus number of Fast Track requests processed to date. The commenter asked for detailed information about process costs and payments received. The commenter acknowledged that the ccTLD community makes contributions on a voluntary basis and reaffirmed the need for all community stakeholders to support the services they receive from ICANN.
4. Commenter suggested that the Fast Track process should incorporate a formal Appeal Process and volunteered assistance in developing such an Appeal Process.
5. A public session on the Fast Track Process should be held before any amendment is made to the Fast Track Implementation Plan.

**(PP)** This comment provided several observations related to the DNS Stability Evaluation process:

1. The commenter emphasized the lack of transparency into the Panel's composition as well as the lack of sufficient explanations after the strings evaluation's unfavorable outcome.
2. The Panel's decisions are too conservative and definitive. It is suggested that Panel's confusability approach towards Greek and Cyrillic character strings versus Latin ones would reject the majority of the related IDN requests.
3. The commenter recommended the inclusion of a transparent set of rules for the DNS Stability Panel's evaluation process such as defining the process in which visual confusability is determined. The commenter also suggested that ICANN should lead a study on string confusability with input from the community in order to reach community consensus on a predictable and repeatable process to determine string confusability.
4. The commenter supported the introduction of an Appeal Process that would allow applicant's experts to answer and object to the DNS Stability Panel's rationale if a string does not pass the Panel's review; an Appeal Panel should also allow for the DNS Stability Panel's decision to be overturned if indeed the applicant's objections are found to be valid.

**(EURid)** This comment contained a number of points:

1. Commenter quoted text from DNS Stability Panel's findings report. This report is provided to the requestor by ICANN staff and details the findings of the DNS Stability Panel. The

commenter expressed that language used in the DNS Stability report to describe the assessment of the DNS Stability Panel caused several concerns.

2. Commenter referred to EURid-developed scientific studies on character confusability issues and the research neuroscientists produced on character perception. The DNS Stability Panel is advised to take into account past and present analyses around this topic as well as possibly include neuroscientist specialization expertise to the assessment mechanism. The comment also referred to the lack of transparency about the structure of the DNS Stability Panel.
3. The commenter recommended for ICANN to define specific Fast Track rules or liaise with ISO in order to avoid IDN delegation exclusions due to confusing similarity with ISO strings.
4. Commenter expressed support for an appeal procedure in the IDN Fast Track process and supported the comment provided by the Hellenic Ministry of Infrastructure, Transport & Networks (PP) to allow the process to take into the requestor's objections.

**(UNINET)** UNINET expressed its support for the comments from EURid and the Hellenic Ministry of Infrastructure, Transport & Networks. Commenter stated that the comment submitted in the 2010 Fast Track review is still valid as no changes were noted to the process since this date per UNINET's contribution.

In their 2010 comment: ' UNINET Stated that they were "the first group in Bulgaria that started public discussions about an IDN ccTLD back in in 2006." During four years of public consultation, polls and surveys indicate that the Bulgarian Internet community would only accept the .бг (bg) string and would vote against any other. UNINET noted there was not a mechanism to challenge the DNS Stability Panel result in the Fast Track process. UNINET suggested the best way forward would be for Bulgaria to reapply in a modified fast track process, with a more open evaluation, "so all interested parties would be able to submit comments and proposals."

## **Section IV: Analysis of Comments**

*General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.*

### **Final Implementation Plan Review and Analysis**

Currently, the Fast Track Process Final Implementation Plan requires that the process undergo review annually. We acknowledge the input suggesting the relevance of an annual review frequency based on community's feedback on the first annual review, initiated in 2010. ICANN will therefore not introduce any immediate changes to the annual review period. On the comment to provide more information about IDN experiences and Market data, staff will consider coordinating with IDN ccTLD operators that are interested in providing information and data about their IDN experiences. It is also worth noting that IDN ccTLD registries regularly provide an update on their experiences with IDNs during the ccNSO sessions at ICANN meetings.

### **Fast Track Costs**

The information available to date about the Fast Track program financials was part of the document posted for public comment when this public comment forum was opened. To summarize, the processing fee was intended to cover costs by a recommended and pre-arranged amount of 26,000 USD per string, based on a cost analysis that was performed and communicated with the community. Of the total amount invoiced, 184,000 USD has been received to date since the inception of the process. It should be noted that the Fast Track process allows those that are unable to pay to contact ICANN for a fee waiver. ICANN does not publish specific contribution information for each completed IDN ccTLD string request in the Fast Track process.

### **DNS Stability Evaluation Process**

Several commenters noted that there is a need for more transparency in understanding how the technical evaluation of an IDN ccTLD string is completed by the DNS Stability Panel. The Panel's evaluation work and composition are outlined in Module 3 and 4 of the Final Implementation Plan. As noted in the Final Implementation Plan, the technical evaluation involves not only a conformity analysis of the requested string with the TLD String Criteria but also a confusability review with existing TLDs, other TLDs requested in the IDN ccTLD Fast Track Process, and applied-for strings in the new gTLD Process.

It is expected that more work on the string similarity process will aid in creating a more predictable and repeatable process. See description on string similarity below.

The IDN Fast Track team will continue to make all necessary efforts to assist requestors in determining the next course of actions available in case of unfavorable assessment results.

### **Fast Track Appeal Process**

Based on the outcome of specific Fast Track applications, several commenters formulated their support for the establishment of an Appeal Process. ICANN cannot comment on a specific application in the Fast Track but recognizes the issues in general, which is part of the reason this specific topic was raised within this Public Comment forum. Suggestions on creation of Appeal Guidelines and Panel

are noted and acknowledged by ICANN. The feasibility of an Appeal Process must be subjected to extended analysis, to address issues such as confidentiality, identification of the appropriate forum for appeal, standards for bringing an appeal and the guidance for review all would have to be established. This concern should be addressed in further discussion and process development with the ccNSO IDN PDP working group.

### **String Similarity**

ICANN acknowledges this issue has broad implications in the IDN community, understands related difficulties for interested IDN communities and recognizes it as important for future consideration of IDN TLDs. In the [Integrated Issues Report](#), the IDN Variant Issues Project (IDN VIP) also recommended further work to tackle the string similarity process in the next phases of the project.

Given the size and importance of the visual similarity process, it is believed that this work should be considered independent of the IDN variant TLD issues, and executed as its own project. This project is included in the ICANN proposed budget for next fiscal year. The main goal of the visual similarity project will be to develop an enhanced visual similarity process for the root that is as predictable and repeatable as possible. If approved, the project will be modeled after previous IDN projects where a group of experts and community volunteers will convene to discuss the current process and make recommendations for improvement.

### **Non-Material Changes to the Final Implementation Plan for IDN ccTLD Fast Track Processes Document**

With the completion of the second annual review of the IDN ccTLD Fast Track Process, ICANN is publishing an updated Final Implementation Plan for the IDN ccTLD Fast Track Process. The changes were marked in the document included in the public comment forum ([Proposed changes](#) to the Final Implementation Plan for IDN ccTLD Fast Track process document). These non-material changes include formatting changes, fixing a few typographical and grammatical mistakes, replacing out-of-date URLs, revising the table of contents, and updating the process flow charts in Appendix 1 to Module 5.

Two versions are posted: 1) the [revised](#) IDN ccTLD Fast Track Process Implementation Plan published on 4 June 2012 and 2) a [version that tracks the changes](#) from the previous version.

The community should take note that the [previous version](#) of the IDN ccTLD Fast Track Process Implementation Plan published on 15 December 2011 is now archived and superseded by the [revised](#) IDN ccTLD Fast Track Process Implementation.

Archived documents remain available under the “IDN Resources” section of the IDN page:  
<http://www.icann.org/en/resources/idn/more>.