

Public Comments-Report Template (v1.2)

Overview:

This template is being provided to assist Staff in the preparation of a report that summarizes and, where appropriate, analyzes community comments. Please save the document in either *.doc or *.pdf format and submit to: web-admin@icann.org. For presentation consistency and to preserve formatting, all Staff Reports will be uploaded to the forum in PDF format; text reports will no longer be supported.

Instructions:

- **Title:** Please enter the exact title that was used in the original Announcement.
- **Comment Period:** Enter the original Open Date and Close Date/Time (*Format: Day Month Year, e.g., 15 June 2011; Time should be expressed in UTC*). Please note if any extensions were approved, e.g., “Extended to Day Month Year [UTC Time]”.
- **Prepared By:** This field will accommodate a situation where a report is developed by an individual or group other than the principal Staff contact, e.g., a Working Group.
- **Important Information Links:** Do not enter any information in this section; Web-Admin will provide the appropriate links.
- **Section I: General Overview and Next Steps**

Please use this area to provide any general summary or highlights of the comments and indicate the next steps following publication of the report. (*Note: this field will auto-text wrap*).
- **Section II: Contributors**

Please use the tables provided to identify those organizations/groups and individuals who provided comments. It is not necessary to identify “spammers” or other commenters who posted off-topic or irrelevant submissions. In addition, if there is a large number of submissions, it is acceptable to characterize the respondent communities rather than attempt to list them individually in tables.
- **Section III: Summary of Comments**

This section should provide an accurate, representative, and thorough review of the comments provided. As the disclaimer explains, this is a summary only of the contributions that the author determines appropriate to the topic’s purpose. Authors are cautioned to be conscious of bias and avoid characterizing or assessing the submissions. If an analysis of the comments is intended, please use Section IV below. (*Note: this field will auto-text wrap*).
- **Section IV: Analysis of Comments**

Please use this section for any assessments, evaluations, and judgments of the comments submitted and provide sufficient rationale for any positions that are advocated. If an analysis

will not be undertaken or, if one will be published subsequently, please add a note to that effect in this section. (Note: this field will auto-text wrap).

Note: You may also utilize, for this section, the Public Comment Issue Tracking Checklist template, which is available at: <https://wiki.icann.org/display/policy/Templates>.

Translations: If translations will be provided please indicate the languages below:											

Report of Public Comments

Title:																	
Publication Date:	29 November 2011																
Prepared By:	The report was prepared by the Devanagari Case Study Team within the Variant Issues Project (see http://www.icann.org/en/announcements/announcement-2-03oct11-en.htm)																
<table border="1" style="width: 100%;"> <tr> <td colspan="2">Comment Period:</td> <td colspan="2" style="text-align: center;">Important Information Links</td> </tr> <tr> <td>Open Date:</td> <td>3 October 2011</td> <td colspan="2" style="text-align: center;">Announcement</td> </tr> <tr> <td>Close Date:</td> <td>14 November 2011</td> <td colspan="2" style="text-align: center;">Public Comment Box</td> </tr> <tr> <td>Time (UTC):</td> <td>23.59</td> <td colspan="2" style="text-align: center;">View Comments Submitted</td> </tr> </table>		Comment Period:		Important Information Links		Open Date:	3 October 2011	Announcement		Close Date:	14 November 2011	Public Comment Box		Time (UTC):	23.59	View Comments Submitted	
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Staff Contact:	Naela Sarras																
Email:	naela.sarras@icann.org																
Section I: General Overview and Next Steps																	
<p>ICANN has conducted six case studies of individual scripts to investigate any issues that need to be resolved to facilitate a good user experience for IDN variant TLDs. This report provides a summary and analysis of comments submitted for the Devanagari case study report. ICANN will complete a consolidated issues report that will summarize and synthesize the issues identified by the case study teams. It is expected that the results of the case studies will play a crucial role in the identification of solutions towards the delegation of IDN variant TLDs.</p>																	
Section II: Contributors																	

At the time this report was prepared, a total of [number] (n) 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.

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee	Matt Ashtiani	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
John C Klensin		JCK
John C Klensin		JCK

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).

The public comment period for the Case Study Team Reports ended on 14 November 2011. There were only two comments that affect the Devanagari report. The first is pertinent to Devanagari and the second by the same author is generic nature. A review report by ALAC was forwarded later and is also considered in this response.

- [Comments on Devanagari VIP team report](#) John C Klensin
- [Overview comments/review - applicable to all VIP team reports](#) John C Klensin
- [Comments by ALAC in PDF format](#)

The first is pertinent to Devanagari and the other two are more generic in nature and cover all the six VIP projects.

A Response to each review is given in what follows in the Analysis of Comments section.

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.

[Comments on Devanagari VIP team report](#) John C Klensin

The first review is complimentary in nature and we would like to thank the reviewer not only for his comments but also for the 3 useful suggestions that have been made. These are as under

- o **The issue with U+02BC, identified in Section 3.4, is another instance of the "Common and Inherited Script" problem discussed in my Overview review.**

Response

While we agree with the pertinence of the remarks of the reviewer, the case of 02BC has been explicitly stated since this is the single character where a code-point which is not part of the Devanagari and Latin code-block has been requested for integration. The code-point is used by 3 major languages Boro, Dogri and Maithili and that too frequently and its non-inclusion would result in a large number of labels not being usable.

The reviewer has suggested that it be included in the "Common and Inherited Script" problem discussed in my Overview review." and the point is well-taken.

Our major preoccupation has been to ensure that the code-point is made permissible and that it be included in the Devanagari code-block. Placing it in the list of Common and Inherited Script" with the proviso pointed out by the reviewer is acceptable.

"Unlimited use of "Common" or "Inherited" characters together with a particular script could easily lead to other problems that none of the teams have addressed. I believe that the only rational approach to the problem will require ICANN tables of valid characters associated with each script. Those tables would exclude characters that Unicode associates with the script that are DISALLOWED by IDNA but include Common or Inherited characters that were necessary for use with the script."

The need for establishing a list of valid characters needed by each script would go a long way in resolving the issue pointed out above and this proviso would also ensure that characters that are excluded will be disallowed.

- o **The discussion of browser behavior in Section 3.3.1 need not be true for all possible browsers and extensions –the behaviors are not inherent in the set of protocols that browsers are effectively required to support.**

Response

While we are in agreement with the reviewer that the behavior need not be true, the browser issue has been stressed for the simple reason that the browser is the window through which the user interacts with the world and this is especially important in the case of complex scripts such as Devanagari where the system font of the browser determines what the user interacts with. This is why a study of browsers under different Operating Systems was undertaken.

- o **Discussions of email addresses should note that, while email may be addressed to sub domains of a TLD (IDN or otherwise), it is not possible to address mail to a user at the TLD-name itself.**

Response

The issue of Email addresses and the risk of spoofing and scamming through this medium was taken as an example. The Variants in our opinion will affect the full gamut of all digital media and email was taken as an example. We agree that it is not possible to address mail to a user at the TLD-Name itself but sub domains are open and it is here that malfeasance is possible. We are thankful to the reviewer for the caveat laid down and would make sure that this caveat is inserted in the policy document.

2. [Overview comments/review - applicable to all VIP team reports](#) John C Klensin

The reviewer report focuses on the following 4 major issues:

1. The reviewer stresses the need to understand the role and implications of label variants – especially variants for “alphabetic” or “alpha-phonetic” scripts – in the top level (“root zone”) of the DNS. The reviewer underscores the necessity of a
“much broader analysis of multiple languages, scripts, the IDNA mechanisms, the DNS and its inherent limitations, and the effects on end users who see the DNS as an identifier and navigation tool and then evaluate and balance all of the tradeoffs involved.”

Response

We would like to state that the Report for Devanagari VIP has as far as possible avoided “producing a fantasy wish list”. The report is well-grounded in factual data and has tried to take a holistic snapshot of the issues and focus on broader issues which fall within the ambit of the Report.

2. The reviewer also stresses the need for a trade off insofar as variants are concerned. Once again the stress is on the human element and it is essential that a correct approach be formulated for blocking of strings:

“Blocking of strings may prevent users from finding what they might be looking for or guessing at, but it prevents errors and conflicts and expedites getting a user who won’t find the correct entry by guessing at DNS names to a different and more effective locational or navigational method.”

Response

The Devanagari VIP Report has strived for just this tradeoff and has tried to the best of the abilities of the team to ensure that the end-user irritation factor is avoided at all costs in the formulation of the report.

3. **Consensus on Variants:**

“Even after these reports, there is no agreement about what the term “variant” means. The usage in the original JET document that defined the term (RFC 3743) is reflected only in the report on the Chinese script. The hope that this project will clarify the usage of that term within ICANN remains in the category of future work and consensus.”

Response

We are optimistic that a variant taxonomy which is a consensual construct based on the different types of variants identified in different scripts and languages will try and address this issue.

4. **“Common and Inherited Script” Issues**

“Unlimited use of “Common” or “Inherited” characters together with a particular script could easily lead to other problems that none of the teams have addressed. I believe that the only rational approach to the problem will require ICANN tables of valid characters associated with each script. Those tables would exclude characters that Unicode associates with the script that are DISALLOWED by IDNA but include Common or Inherited characters that were necessary for use with the script.”

Response

These have been enunciated and treated in the first part.

3. [Comments by ALAC in PDF format](#)

The ALAC report appreciates the work done by the VIP Case Study teams. However it points out the following:

“The ALAC also observe the possible disparity between the policy and technical implications of implementation. We therefore advise the VIP case study teams to also identify the readiness of implementation, including the level of consensus within the language community, the impact across languages, and most importantly to avoid disadvantaging language communities that have implementable policies available.”

Response

This observation of ALAC is well-taken. In India the GIST Group, CDAC under the aegis of the Department of Information Technology, Ministry of Communications and Information Technology, Government of India and NIXI has systematically taken consensus of the language communities using the script not only through placing the policy for public review but also by organizing Public Awareness Workshops in each geo-linguistic region where the particular language is spoken and also by consulting experts both linguists and literary personalities; this to ensure an across the board consensus. This ensures that the recommendation of the ALAC regarding the impact across languages and the need to ensure that no language community which has an implementable policy available is disadvantaged, is taken care of.