ICANN | GAC
Governmental Advisory Committee

28 September 2016

To: Katrina Sataki
ccNSO Chair

Cc: Dr. Steven Crocker
Chair, Board of Directors
ICANN

Ref: EPSRP working group - public comment

Dear Katrina,

Although the public comment period has expired, the GAC would like to share the following comments with you and the ccNSO EPSRP WG for your further consideration of this matter:

The GAC thanks the EPSRP Working Group for their assessment and considerations on the overall ICANN policy for the selection of IDN ccTLD strings. The GAC fully supports some of the key points expressed by the working group, in particular:
- ccTLD policy is a matter for the local internet communities to determine.
- An IDN ccTLD application represents the free choice of a specific linguistic community that has full right to use its language and script in the DNS space.
- Where a finding of potential confusability has been made, rather than rejecting the application, the process should allow the applicant to propose mitigation measures and to assess fully the possibility versus probability of any such confusion
- Where there is a split recommendation (between upper case and lower case), the finding relating to the lower case shall prevail and the application shall go forward where probability of confusion is low
- ICANN must ensure consistency in the evaluation of the IDN strings throughout the TLD space and remedy the current, different approaches that are present in the gTLD and ccTLD space

Sincerely yours,

Thomas Schneider
Chair, Governmental Advisory Committee