

**Staff Consideration of Public Comments Received on the
IDNC WG Final Report**

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Introduction

The IDNC Working Group (IDNC WG) has developed its Final Report on feasible methods that would enable the timely and efficient ("fast track") introduction of a limited number of non-contentious IDN ccTLDs, while an overall long-term IDN ccTLD policy is being developed. The Final Report highlights the topics and issues that need to be considered in developing (1) a mechanism for the selection of the IDN ccTLD string and (2) a mechanism to designate an IDN ccTLD manager. The ICANN Board of Directors accepted the Final report at its 26 June meeting in Paris, France and directed that the report be made available for public comments.

In addition to opening the public comment period, the ICANN Staff has been directed by the Board to begin work on an implementation plan for the fast track with relevant stakeholders and to prepare a detailed implementation report to the Board before the ICANN Cairo meeting in November 2008. The comments received will be used by the staff to help fulfill those obligations.

The public comments period ran from 15 July until 15 August 2008. During this period 8 relevant comments were received. In the balance of this report they are summarized and linked with the relevant parts of the IDNC WG Board Proposal, dated 25 June 2008. If the comment deals with a topic that is not addressed in the report itself, the comment is added at the end of the report. The full text of the comments is included as an Annex.

As part of the implementation work ICANN staff has prepared this document to provide clarification where requested or needed if it the point raised has a potential impact on the implementation plan or the continued dialogue in the community. This document reproduces the IDNC WG report, and then shows community comments and staff comments in context of that report.

To assist the reader, the full text of the IDNC WG report is in Arial. The summary of the received comments and associated staff considerations are provided in tables within the text of the IDNC WG Final report, followed by the full text of the received comments (all in Times Roman).

The announcement requesting comments can be viewed here:

<http://www.icann.org/en/announcements/announcement-15jul08-en.htm> and all received comments can also be viewed in the online archive: <http://forum.icann.org/lists/idn-ccTld-fast-track/>.

Background Information

The IDNC WG was chartered by ICANN's Board in November 2007 to develop and report on feasible methods, if any, that would enable the introduction (in a timely manner and in a manner that ensures the continued security and stability of the Internet) of a limited number of non-contentious IDN ccTLDs, associated with the ISO 3166-1 two-letter codes ("the fast track"), while the overall IDN ccTLD policy is being developed. The scope of the IDNC WG was limited to developing methods that would not pre-empt the ultimate policy outcomes of the IDN cc Policy Development Process (ccPDP).

**IDNC Working Group
Board Proposal**

25 June 2008

(Including received community comments and staff reactions to these)

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Part A

Final Report of IDNC Working Group

1. Executive Summary

The IDNC WG was tasked by the ICANN Board to recommend mechanisms to introduce a limited number of non-contentious IDN ccTLDs, associated with the ISO 3166-1 two-letter codes, to meet near term demand, while the overall policy is being developed.

The scope of the IDNC WG is limited to developing feasible methods (for the introduction of a limited number of IDN ccTLDs) that do not pre-empt the policy outcomes of the IDN ccPDP.

The IDNC WG has developed and recommends a three-stage methodology for the Fast Track. This methodology is based on and takes into account the overarching requirements as defined in its Charter and a number of guiding principles for the methodology on which the IDNC WG reached consensus.

The Methodology:

Territory prepares to enter the Fast Track

1. Identify script and language
2. Select String
3. Document the endorsement in territory of identified language/script and string.
4. Appoint/ select IDN ccTLD manager or identify the relevant public authority and prepare documentation on endorsement/support, and other items necessary to enter the Due Diligence stage
5. Prepare language table to be used

Due Diligence

1. Submit language table into IANA Repository and submit selected string and related documentation.
2. Due Diligence of selected string by 'Technical Committee'.
3. Publish selected string on ICANN website

Delegation Process

1. Request delegation in accordance with current IANA procedures

2. Introduction

The purpose of the Fast Track is to introduce a limited number of non-contentious IDN ccTLDs, associated with the ISO 3166-1 two-letter codes in a short time frame to meet near term demand. The scope of the IDNC WG was limited to developing feasible methods (for the introduction of a limited number of IDN ccTLDs) that do not pre-empt the outcomes of the IDN ccPDP.

The IDNC WG published for comment a draft Initial Report to canvass the topics that need to be covered.

The IDNC WG published a draft Interim Report to canvass a methodology.

As determined in the Initial and Interim Report, the Fast Track requires two specific mechanisms:

1. A mechanism for the selection of the IDN ccTLD string; and
2. A mechanism to designate an IDN ccTLD manager.

The IDNC WG is aware of the current review and revisions taking place of the current IDNA protocol (RFC 3490, hereafter: IDNA 2003). The IDNC WG is also aware that implementing the Fast Track process as recommended, may be dependent on conclusion of that revision (IDNA*bis*, Work in progress, hereafter: IDNA 2008).

Who	Topic	Issue	Staff Comment
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Dependency on revision of relevant standard	Recommendation IDNC WG is appropriate. Additionally, discussion relating to other standards should be monitored and taking into account. Review of IDNA <i>bis</i> , its related documents and STD 3 (RFC 1123) should be completed before the introduction of IDN TLDs.	It is preferred that the IDNA protocol revision and any associated technical standard revisions be completed prior to the implementation of IDN TLDs. However, should this not be possible, then additional technical requirements may be introduced to ensure IDNs can be added in a secure and stable manner.

As instructed by the ICANN Board and reflected in the charter of the IDNC WG the proposed methodology is developed within the parameters of the overarching requirements to:

- Preserve the security and stability of the DNS;
- Comply with the IDNA protocols and IDN guidelines;
- Take input and advice from the technical community in respect to the implementation of IDNs; and
- Comply with current practices for the delegation of ccTLDs, which include the current IANA practices, amongst others, RFC 1591 and the GAC-ccTLD Principles.

A number of general guiding principles (section 3) have been developed which, within the context of the overarching requirements, structure, guide and set conditions for the methodology. These principles are based on and take into account the substantive input received on the Initial and Interim Report.

The methodology itself is presented in section 4. It is a three stage approach, devised to enable the relevant actors in the territory to self-assess and determine whether the delegation of an IDN ccTLD under the Fast Track process is feasible and to enable the relevant stakeholders to select a string for the IDN ccTLD and prepare for a delegation request. The methodology describes (at a high level) the activities, roles, and responsibilities of the actors involved in the processes. It is anticipated that this will need to be further detailed by ICANN staff as a matter of implementation.

The IDNC WG is aware that in order to implement the recommended methodology some of the current procedures and practices, for instance the practices relating to the maintenance of the repository and requirements for an IDN table, may need to be changed to implement the recommendations. However, identifying these procedures or suggesting changes is considered a matter of implementation.

Alternative views of some members of the Working Group are presented in Section 5.

The report concludes with an overview of the specific recommendations (section 6) and background information on the IDNC WG and process (section 7).

The list of members of the IDNC WG is included in Annex A.

The IDNC WG recommends that as part of the implementation plan a request for information (RFI) is sent out to all territories to gain an understanding of the interest of individual territories to participate in the Fast Track process. Participation in the RFI should however not be mandatory to be eligible for an IDN ccTLD under the Fast Track. It is suggested that through the RFI process relevant information is gathered on at least the following: interest of the territory to participate in the Fast Track, and if so, what language/ script is considered and which string is intended to be selected. Furthermore an indication of the timeframe

in which the territory intends to enter the Fast Track could be useful. It is suggested that the information collected will be published by ICANN. However a territory may request ICANN to keep all or part of the provided information confidential. All territories should be contacted.

Who	Topic	Issue	Staff Comments
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Request for Information	Recommendation IDNC WG useful for planning purposes. Transparency of information received should be maintained as much as possible	ICANN staff will post an overall report describing replies to the RFI letters prior to the ICANN meeting in Cairo. Replies are still being received and some have requested confidentiality, so will not be included in the report.

3. Guiding Principles

Based on the substantive input during the various comment periods the IDNC WG has established the following guiding principles:

A: Ongoing Process

The Fast Track should be an ongoing process and thus open for a selected IDN ccTLD manager (hereafter referred to as: selected delegate) to enter when ready. The Fast Track should cease to be available when the overall IDN ccTLD policy has been adopted by the ICANN Board.

Who	Topic	Issue	Staff Comments
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Ongoing Process	Concept of Ongoing Process is consistent with IDNC charter. Introduction process should be predictable i.e. well published and with predictable time schedules.	Notifications will be provided to the community in a timely manner prior to the launch of the Fast Track process. The close of the Fast Track process will be determined as soon as a finalization date of the IDN ccPDP is established. However, every step in the process cannot be defined in advance. A preliminary indication of the duration of each step in the process will however be provided.

B: Non pre-emption of overall policy

The Fast Track should not pre-empt final IDN ccTLD policy, so it must be a simple, clear and limited solution.

C: The purpose of the Fast Track is to meet pressing demand

The Fast Track should only be available where there is a pressing demand in the territory. This is evidenced by the readiness of the selected delegate and relevant stakeholders in the territory to meet the requirements to introduce an IDN ccTLD under the Fast Track.

D: Fast Track only for non-Latin scripts

The possibility of IDN ccTLDs being delegated in Latin script is a matter that will be considered as part of the ccPDP. Accordingly, in the Fast Track, the script has to be a non-Latin script to avoid pre-empting the outcome of the ccPDP.

E: The proposed string and delegation request should be non-contentious within the territory

Delegation of an IDN ccTLD should only be possible in the Fast Track where the IDN ccTLD string is non-contentious within the territory and the designation of the selected delegate is non-contentious within the territory. This is evidenced by the support/endorsement of the relevant stakeholders in the territory for the selected string as a meaningful representation of the name of the territory and for the selected delegate.

Who	Topic	Issue	Staff Comments
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Scope of non-contentiousness	<p>* The proposed Fast Track Methodology definition that a “proposed string and delegation request should be no contentious within the territory”, seems to be a significant departure from the original scope.</p> <p>* IDNC WG vision of non-contentiousness departure from current practices. Current practice follows the process of the ISO 3166-1 standard where the two-letter string is</p>	<p>According to majority of the IDNC WG it is within original scope of the IDNC WG charter to limit non-contentiousness reflects the following: The purpose of IDNC WG was “to develop and report on feasible methods, if any, that would enable the introduction...of a limited number of non-contentious IDN ccTLDs.” However, it is important to note that under the IDNC WG charter, the purpose of the IDNC WG is qualified and limited by the scope of the IDNC WG.</p> <p>The scope of the IDNC WG is “to develop (...) feasible methods (for the introduction of a limited number of IDN ccTLDs) In considering feasible methods the IDNC WG should take into account and be guided by:...</p>

		<p>determined in an international collaborative effort. IDNC WG suggests introducing a method whereby a territory would unilaterally propose a TLD string.</p>	<p>- Current practices for the delegation of ccTLDs.” In drafting Point E as with the other points and the methodology itself, it is the scope of the WG that has been our guide. There are a number of current practices followed that support the current wording of Point E. Among them are ‘The Principles and Guidelines for the delegation and administration of Country Code Top Level Domains’ of the Governmental Advisory Committee. Those principles state “ultimate public policy authority over the relevant ccTLD rests with the relevant government or public authority (..)”. And, further, “every country or distinct economy with a government or public authority (...) should be able to ask for its appropriate country code to be represented as a ccTLD in the DNS and to designate the registry for the ccTLD concerned.” The wording of principle E captures these two core concepts.</p> <p>Further, the principle of sovereign equality of all States, which is part of the WSIS declaration of Principles (nr 63), is also reflected in the wording of Point E. The proposed string is a matter of the relevant state/territory subject only to any overarching global policy or criteria that may exist.</p> <p>With regard to the claimed practice that the ISO 3166-1 two-letter codes are assigned through a international collaborative effort the following should be noted: The ISO 3166 Maintenance Agency</p>
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			<p>allocates alphabetic code elements to names of “territories” on the basis of attempting to obtain the greatest possible degree of visual association between the code elements and the short names of the territories. Only the “core” names should be used as the basis. If the relevant government and international organizations express wishes that a particular code element should be used to represent the short names of the territories, the MA should consider such wishes within the general framework of allocation. Wishes coming from governments and national institutions are only considered to the extent that they refer to their own territory.</p> <p>In other words the ISO 3166 MA allocates code elements based on a set of rules. Only governments and national institutions can request an alternative code only to the extent this refers to their territory. Source: Guidelines for the Maintenance of ISO 3166.</p>
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F: The Fast Track is experimental in nature

The introduction of IDN ccTLDs is experimental in nature, and therefore should not be considered to be precedent setting. The experimental nature of the Fast Track should also be taken into consideration when delegating names under the Fast Track. However, this should not be interpreted to mean that a delegation under the Fast Track will be temporary.

Who	Topic	Issue	Staff comment
G. Malhas, Jordan	Experimental nature Fast Track	Experimental should not mean temporary. Smooth transparent transition from “experimental” to permanent.	According to recommendations of the IDNC WG Final Report, “experimental” should not be interpreted to mean a delegation is temporary. With regard to the transition: this will be part of the implementation plan, and the finalization of the IDN ccPDP.

G. Criteria determine the number of IDN ccTLDs under the Fast Track.

The criteria to select the IDN ccTLD string, and to designate the IDN ccTLD manager should determine the number of eligible IDN ccTLDs, not an arbitrarily set number.

4. Fast Track methodology

Stage 1: Preparing for the Fast Track in Territory

To be eligible under the Fast Track a territory should be listed on the 'International Standard ISO 3166-1, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes', (hereafter referred to as: Territory). The only exception to this requirement is the European Union which although not on the said list currently has a ccTLD (.eu) and is therefore eligible under the Fast Track.

This part of the process should be performed by the local actors in Territory. Typically this would involve:

- The selected delegate: typically initiates the process and provides the needed information and documentation
- The relevant public authority associated with the selected IDN ccTLD,
- Parties served by the IDN ccTLD. They are asked to show that they support the request and that it meets the interests and needs of the local Internet community

(See: <http://www.iana.org/domains/root/delegation-guide/>):

In cases where a delegate is not yet selected in the Territory the relevant public authority of the Territory may perform the role of the "selected delegate" until the Territory is ready to enter stage 3 of the Fast Track process.

1. Identify the language and script for the string and language table.

The criteria to identify the language/script are:

- The language must be an 'official' language
- The script in which the language is represented has to be non-Latin

Official language criteria

For the purpose of the Fast Track, an 'official' language is one that has a legal status in the Territory or that serves as a language of administration (hereafter: Official Language).

This definition is based on: "Glossary of Terms for the Standardization of Geographical Names", United Nations Group of Experts on Geographic Names, United Nations, New York, 2002.

A language is demonstrated to be an Official Language:

- a. If the language is listed for the relevant Territory as an ISO 639 language in Part Three of the “Technical Reference Manual for the standardization of Geographical Names”, United Nations Group of Experts on Geographical Names (the UNGEGN Manual) (<http://unstats.un.org/unsd/geoinfo/default.htm>); or
- b. If the language is listed as an administrative language for the relevant Territory in ISO 3166-1 standard under column 9 or 10; or
- c. If the relevant public authority in the Territory confirms that the language is used in official communications of the relevant public authority and serves as a language of administration.

Who	Topic	Issue	Staff Comments
APTLD, Jonathan Shea, Chair of APTLD	Eligibility of territory for Fast Track	If a territory is not listed in the UNGEGN Technical Manual, it should be clear that this does not disqualify those countries of distinct economies from eligibility under the Fast Track	The IDNC WG stated as an overarching principle that to be eligible under the fast track the territory should be listed on the ISO 3166-1 list, including the EU. Secondly, the IDNC WG was aware of that some territories are not listed in the UNGEGN Technical Manual. For that reason the alternatives for the UNGEGN are included.
Abdulaziz Al-Zoman, Saudi Arabia	Idem	UNGEGN Technical Manual does not include territories (for example Palestinian Territory, Occupied) which are included in the ISO 3166-1 standard and in IANA database	Ibidem
APTLD, Jonathan Shea, Chair of APTLD	Version ISO 3166- 1 standard	Specification of which ISO 3166-1 standard would be useful.	The ISO 3166-1 standard is regularly revised. The current version is ISO 3166-1: 2006. However, the ISO 3166-1 MA regularly publishes newsletters, to update the latest version of the Standard (see: http://www.iso.org/iso/country_codes/updates_on_iso_3166.htm).

In the event that there is more than one Official Language in the Territory, it may be possible for the Territory to use the Fast Track for the delegation of one IDN ccTLD in each of those languages.

Who	Topic	Issue	Staff Comments
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Number of IDN ccTLD strings per territory	In principle only one IDN ccTLD string per ISO 3166-1 entry per relevant script per relevant language, but in any event no more than one Fast Track IDN per relevant language. This position reflects GNSO Councils understanding and respect for territories where multiple languages share a single script, such as in India.	The implementation assumes one string per official language per country or territory

Requirements relating to the script

For purposes of the Fast Track the term "non-Latin script" is used to designate any script that does not contain the twenty-six letters listed in the US-ASCII character set (a-z), either in their basic forms or with combining marks.

2. Select String

The selected string must meet the meaningfulness and technical requirements

Meaningfulness Requirement

For purposes of the Fast Track the string used must be meaningful in the Official Language. A string is meaningful if it is in the Official Language and:

- a) is the name of the Territory; or
- b) a part of the name of the Territory that denotes the Territory in the language; or
- c) a short-form designation for the name of the Territory, recognizably denoting it in the indicated language

Where the selected string is listed as the long form or short form name of the relevant Territory in of the UNGEGN Manual then the string should be considered to be meaningful. If the string is not so listed then meaningfulness will need to be documented by the selected delegate of the IDN ccTLD.

The selected string is considered to meet the criteria if:

1. The identified language is an Official language/script of the Territory in accordance with the definition in Stage 1, section 1 above and
2. The selected string is the long or short form name of the relevant Territory in the identified language in the UNGEGN Manual, Part Three column 3 or 4

In all other cases additional documentation should be provided by the selected delegate.

Other cases include:

- (i) the selected string is a part of the long or short form name of the Territory in the UNGEGN Manual in the selected language or
- (ii) an acronym of that name or
- (iii) the Territory or the language do not appear in the UNGEGN Manual.

Where the documentation presented includes a report from an internationally recognised linguistic expert(s) or internationally recognised organisation that the selected string meets the criteria, ICANN should be guided by this.

Territories using the same script may, if they wish, consult with each other on the selection of a relevant IDN ccTLD string.

Technical Requirements

- The label itself is in accordance with and complies with IDNA2008 protocol
- No characters other than identified in Unicode as Letters or [combining] marks are used
- No characters are used that map out as compatibility equivalents and only strings that are NFC-compliant
- No leading or trailing digits (in any script) are used.
- No joiners or other invisible characters are used
- There is no mixing of scripts
- The proposed string is valid both for IDNA2003 and IDNA2008
- No names that are shorter than two characters in non-ASCII are used;
- It is demonstrated that the selected string in combination with the language/script table when being used, in for example e-mail addressees, URIs etc, does not create any rendering or other operational issues.
- Verification that the proposed code can not be interpreted as any of the elements in the alpha-2 codes that is used by ISO 3166/MA (section 5.2 of ISO 3166-1:2006)

Who	Topic	Issue	Staff Comments
APTLD, Jonathan Shea, Chair of APTLD	Clarification Technical Requirements	What "does not creating rendering or other operational issues" mean, and how it can be demonstrated/	There can be various different kind of rendering problems when it comes to IDNs, some relate to look-alike character issues other are more technical and have to do with for example bidirectional display algorithm issues. While it is not possible to ensure that all rendering problems are avoided, due to the nature of the DNS and the fact that many of these appear in the application layer, it is important that as much as possible are avoided while the technology is being build and implemented, and also that the potential TLD registry operator is

			<p>aware of these flaws. One can become familiar with this by understanding the IDNA protocol and in particular via the proposed new version of the IDNA protocol – others by active participation in the IDN wiki where some rendering problems can be demonstrated and experienced. One example of a rendering problem as referred to above can be for the potential TLD registry operator to demonstrate that they have tested that the character “x” (first character in their proposed TLD) has rendering problems together with the character “y” (that might be the end of the 2nd level domain). Because of this, the registration policy for this TLD prohibits all 2nd level domains that end with “y”.</p>
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As the revision of the IDNA protocol has not been concluded, the technical requirements included in this report may need to be updated to comply with IDNA2008 when finalised. This update is considered to be a matter of implementation planning.

Who	Topic	Issue	Staff Comments
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Official Language & meaningful string in general (Final Report Section 4 Stage 1 section 1 and 2)	Adherence to ISO 3166 standard and use of internationally accepted documents should be encouraged and is appropriate. When not listed in UNGEGN, little structure provided. Advised to learn from WIPO II discussions, new gTLD process discussions along with using expertise from UNESCO.	One of the core recommendations of the IDNC WG is that the string has to be a meaningful representation of the name of territory in an official language. Furthermore, the method the IDNC WG has recommended puts the initial burden on the territory to document the selected string represents the name of the territory and the language is official. To assist territories and ICANN the IDNC WG refers to the UNGEGN for both elements in the definition, the meaningful representation and “official language”. However the IDNC WG has noted: 1. Not all territories listed on the ISO 3166 -1 are listed in the UNGEGN Technical Manual, and 2. not all “official” languages for a territory are listed. In

			order to assist territories and to select a string that meets the criteria the IDNC proposed a method with increasing burden to document the selection. At the same time the IDNC WG has recommended the use of indicators and calls for the assistance of internationally recognised organisations.
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3. Document endorsement /support by actors in Territory for identified language and script and selected string.

It is proposed that with regard to the selection of a string the involvement of the relevant actors in the Territory should be documented in a similar manner as is required for a delegation request, by the selected delegate.

(See < <http://www.iana.org/domains/root/delegation-guide/> >)

It is also recommended that the selected delegate provides the relevant documentation at the start of the due diligence stage.

4. Prepare language table

For requirements and purpose of preparing the language/script table see Stage 2 Due Diligence, Step 1 and Step 2.

The language/script table to be used by the IDN ccTLD may already exist i.e. has been prepared by another Territory using the same language/script and was already submitted. In this case the selected delegate should indicate its intention to use that language/script table.

Territories using the same script are encouraged to cooperate in developing a language/script table, in accordance with IDN guidelines.

5. Select intended IDN ccTLD manager

In accordance with current practices for delegation of a ccTLD (see for further information: <http://www.iana.org/domains/root/delegation-guide/>)

Stage 2: Due Diligence

Step 1. Submission of language table into IANA Repository

Unless the selected delegate indicates it intends to use a language/script table for the official language that is already in the IANA Repository, the language/script table must be submitted to IANA in accordance with the practices relating to the

maintenance of the repository and requirements for an IDN table (for current practices see: <http://www.iana.org/procedures/idn-repository.html>. As indicated in the introduction this practice may need to be updated to implement the recommendations).

Step 2 Due Diligence

A. Basic Premises

The ICANN Board is responsible for the final decision to delegate a TLD. The Fast Track methodology sets a series of criteria that must be met in order for a delegation to be approved by the ICANN Board. However, it is not considered appropriate for the ICANN Board to be required to confirm that a selected string meets either the technical or the meaningful criteria. With regard to the meaningfulness criteria of the selected string it is recommended that the selected delegate provides adequate documentation to authenticate the meaning of the selected string in the Official Language and that it meets the criteria. It is further recommended that the selected delegate submits a statement from an internationally recognised organisation to authenticate the meaning of the selected string both in the Official Language and in English.

To validate that the technical requirements are met the IDNC WG recommend that an external and independent “Technical Committee ” should be appointed to conduct the technical due diligence and report to the Board.

In order to avoid unnecessary delay and for reasons of efficiency, the documentation with regard to the meaningfulness and the report of the Technical Committee should be available early in the process (no later than at the end of Stage 2).

B. Provision of information on meaning of selected string

In order to assist territories to provide information demonstrating that the string meets the meaningfulness criteria it is recommended that the ICANN Board provides a list of suggested internationally recognised organisations that could provide the territory with external and independent documentation on the meaning of selected string in the Official Language and an authenticated translation in English.

C. Technical Committee

1. Role and responsibility. To provide external and independent advice to the Board that, based on the documentation provided by the selected delegate, the selected string meets the technical criteria. If after a request for clarification the Technical Committee still finds that the selected string does not meet one or more of the criteria, the request for the IDN ccTLD with that particular selected string is not eligible under the Fast Track.

2. Required documentation

Information required from the selected delegate:

- the selected string in the selected language, script and its equivalent in English;
- the selected string in xn--- format; and
- the UNICODE code points.
- a reference to the language and script used;
- the ASCII ccTLD string and name of Territory that the IDN-ccTLD is associated with;
- the language table to be used both for the TLD and for delegations under the TLD (see Due Diligence Step 1).

3. Due Diligence Technical Committee

The selected string is considered to meet the criteria if the Technical Committee establishes the string meets the criteria as defined in Stage 1, section 2, technical requirements above.

If necessary the Technical Committee can seek further clarification from the selected delegate.

4. Structure of Technical Committee

The Technical Committee should be appointed by the ICANN Board, and should be external to and independent of the ICANN structure.

For the purpose of assisting the selected delegate, where the Technical Committee seeks clarification on some aspect of the string, the Technical Committee should be able to provide the selected delegate with access to a pool of recognised independent technical experts for advice.

Step 3. Publication result of due diligence stage

It is recommended that ICANN publishes the selected string in the identified language, in English, and other relevant formats on its website as soon as the advice of the Technical Committee and documentation of the engaged international organisation are available, and it is evidenced that the selected string is supported/endorsed by the relevant stakeholders in Territory.

Stage 3: Designation of IDN ccTLD

Request for delegation

- In accordance with current IANA practices for delegation of a ccTLD

Given that some time may have elapsed between the end of Stage 2 and the delegation of the selected string, and as the technical circumstances with respect to IDNs may have changed prior to the delegation of the selected string, the

Technical Committee should be requested to reconfirm that the selected string meets the technical criteria.

In the view of the IDNC WG there are no additional requirements relating to the delegation of an IDN ccTLD. The delegation of an IDN ccTLD should be conducted according to current practices for delegation.

5. Alternative views

In accordance with the charter any minority positions shall be incorporated in the IDNC WG (draft) Final Report. In this section these views are presented, including a reference to the section in section 3 and 4, the name and affiliation of the proposer and members of the WG supporting the minority position. Please note this is a draft Report, produced to inform the community. As discussion will continue, this part of the report may be especially susceptible to change.

Each alternate view is a direct quote from the proposer.

1. Alternative position on Principle E:

“Delegation of an IDN ccTLD should only be possible in the Fast Track where the designation of the selected delegate is non-contentious within the territory. This should be evidenced by the support/endorsement of the relevant stakeholders in the territory for the selected delegate. The IDN ccTLD string proposed should be non-contentious within the territory, and should be non-contentious for the security and stability of the Internet. This should be evidenced by the support/endorsement of the relevant stakeholders within the territory that the selected string is a meaningful representation of the name of the territory and that the security and the stability for the Internet community is maintained”.

Position proposed by Edmon Chung, member IDNC WG on behalf of GNSO,
Affiliation: .ASIA

2. Alternative position on Principle E:

“Maintaining Consistency with Current ccTLD Practices and GAC ccTLD Principles

Another alternative view understands that based on available documentation of ccTLD practices, including the GAC ccTLD principles, while it is accepted that the delegation of a ccTLD should be a matter within the corresponding territory, the current practice for the selection of the ccTLD string is explicitly established through international collaboration. More specifically, the current ccTLD practice is not a mechanism whereby each territory proposes a particular two-letter string to ICANN, but rather it follows the process of the ISO 3166-1 standard. The IDN ccTLD Fast Track, will introduce a new method that cannot be said to be identical with the current ccTLD practices. Therefore, it is important to continue to

maintain, as the IDNC WG charter expresses, that the IDN ccTLD introduced in the Fast Track should be non-contentious.”

Position proposed by Edmon Chung, member IDNC WG on behalf of GNSO,
Affiliation: .ASIA

3. Alternative position on Principle E:

Non-Contentious of an IDN ccTLD in the Fast Track within a country/region

“There is an alternative view that the IDN ccTLD string for Fast Track should be non-contentious not only within the territory. Because not all ccTLDs (i.e. the list of entries of in the ISO 3166-1 standard), are sovereign countries, it may be useful to consider non-contentiousness within a corresponding country, region or collective of territories.”

Position proposed by Jian Zhang, member IDNC WG on behalf of ccNSO,
Affiliation: CNNIC

Position supported by Jonathan Shea, member IDNC WG on behalf of ccNSO,
Affiliation: HKNIC

4. “Mechanism for Handling Comments

There is an alternative view that a mechanism to handle comments early in the IDN ccTLD Fast Track process would be beneficial. The mechanism should allow potential issues that affect the security and stability of the technical and social fabric of the Internet to be raised and subsequently addressed to improve the efficiency and transparency of the overall process”.

Position proposed by Edmon Chung, member IDNC WG on behalf of GNSO,
Affiliation: .ASIA

Position supported by:

Jonathan Shea, member IDNC WG on behalf of ccNSO, Affiliation: HKNIC;

Jian Zhang, member IDNC WG on behalf of ccNSO, Affiliation: CNNIC

5. “Enforcement of Compliance to IDN Standards and ICANN IDN Guidelines

While the group believes that the issue of whether any legal arrangement should be established between ICANN and the Fast Track IDN ccTLD is outside of the scope of the IDNC WG charter, an alternative view holds that in consideration of the overarching technical requirements for the deployment of IDN, this report should encourage ICANN to have in place an expressed understanding with the Fast Track IDN ccTLD to ensure continued compliance with the IDN standards and ICANN IDN Guidelines.

Furthermore, such expressed understanding should ensure a smooth transition of the Fast Track IDN ccTLD to the ccPDP IDN process once it is established”.

Position proposed by Edmon Chung, member IDNC WG on behalf of GNSO,
Affiliation: .ASIA

6. Overview of recommendations

Recommendation 1

The Fast Track should be an ongoing process, which ends at the time the overall IDN ccTLD policy is adopted by the ICANN Board.

Recommendation 2

The Fast Track should be a three stage process:

Stage 1. Preparation in the Territory.

This stage concludes when the selected delegate submits:

- The selected string for the IDN ccTLD in the identified language, a xn--- representation of that string, and a representation in UNICODE code points, and related documentation;
- A language/script table for the identified language/script, and related documentation.

Stage 2: Due diligence

This stage starts with the submission of the selected string and related documentation, and language/script table and related documentation by the selected delegate, which could be the relevant public authority in cases an IDN ccTLD manager has not been selected yet.

This stage ends with the publication of the selected string in the identified language, in English, and the xn—format on the ICANN website. Publication is dependent on completion of the report of the Technical Committee, and evidenced endorsement/support by the relevant stakeholders in Territory for the selected string.

Stage 3. Delegation Request

This stage starts with request for delegation by selected delegate in accordance with current IANA practices. Such a request for delegation can be submitted as of the moment the selected string is published on the ICANN website.

Recommendation 3

An IDN ccTLD string should be a meaningful representation of the name of the Territory in an identified Official Language of that Territory. The Territory should be listed in the “International Standard ISO 3166-1, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes”, which For purposes of the Fast Track this includes the European Union.

Recommendation 4

In the event that there is more than one Official Language in the Territory, it may be possible for the Territory to use the Fast Track for the delegation of an IDN ccTLD in each of those languages

Recommendation 5

A selected string must meet the technical and meaningfulness criteria.

Recommendation 6

A language/script table with the permissible code points under the relevant IDNA Protocol and IDN guidelines (see for current version:

<http://www.icann.org/general/idn-guidelines-22feb06.htm>) must be submitted to IANA in accordance with the practices relating to the maintenance of the repository and requirements for an IDN table as defined.

Recommendation 7

For purposes of a Technical due diligence the selected delegate, or the in case the intended IDN ccTLD manager has not been selected yet, the relevant public authority, should submit:

- the selected meaningful string in the Official Language and English in writing,
- in xn--- format;
- UNICODE code points; and
- other relevant, related documentation to enable the due diligence.

Recommendation 8

The ICANN Board should appoint a “Technical Committee” external to and independent of the ICANN structure to perform technical due diligence on behalf of the Board.

Recommendation 9

ICANN should publish the selected string in the identified language, in English and other relevant formats at the end of its due diligence.

Recommendation 10

Given that some time may have elapsed between the end of Stage 2 and the delegation of the selected string, and as the technical circumstances with respect to IDNs may have changed, prior to the delegation of the selected string, the Technical Committee should be requested to reconfirm that the selected string meets the technical criteria.

7. Background IDNC WG and Process

At the San Juan meeting in June 2007, and the ICANN Board resolved inter alia that "... the ICANN community including the GNSO, ccNSO, GAC and ALAC provide the Board with responses to the published list of issues and questions that need to be addressed in order to move forward within ccTLDs associated with the ISO3166-1 two-letter codes in a manner that ensures the continued security and

stability of the Internet.” Further, “...the Board also requested that technical limitations and requirements will be taken into consideration, to explore both an interim and an overall approach to IDN ccTLDs associated with the ISO 3166-1 two-letter codes and recommend a course of action to the Board in a timely manner.”

In response, the ccNSO Council at its meeting on 2 October 2007, requested that an Issue Report be prepared to establish whether the ccNSO should launch a PDP to develop the policy for the selection and delegation of IDN ccTLDs associated with the ISO 3166-1 two letter codes. A draft Issue Report is expected to be provided to the ccNSO Council on June 2008. The Issues Paper and answers developed by various ICANN constituencies will become input to the ccPDP, should the ccNSO Council resolve to initiate a PDP.

The ccNSO also released two discussion documents regarding a possible interim approach to IDN ccTLDs: “Designing an Interim Approach” and the “Charter IDNC”. These documents were *inter alia* discussed by the GAC at the meeting in Los Angeles and the communiqué reaffirmed GAC support to the possibility of a fast track approach and welcomed the proposal of the ccNSO Council to create an IDN working group. The GAC agreed to actively engage in the process.

At its meeting in Los Angeles the Board [chartered](#) a joint IDNC Working Group ([IDNC WG](#)) and invited the Chairs of the ccNSO, GNSO, GAC, ALAC, and SSAC to set-up the IDNC Working Group and appoint members to this group. The IDNC WG task is to develop and report on feasible methods, if any, that would enable the introduction of a limited number of non-contentious IDN ccTLDs, in a timely manner that ensures the continued security and stability of the Internet while a comprehensive long-term IDN ccTLD policy is being developed. On 14 December the IDNC WG was established (membership of the IDNC WG: see <http://www.ccnso.icann.org/workinggroups/idncwg.htm>).

On 1 February 2008, the IDNC WG posted a “[Discussion Draft of the Initial Report](#)” (DDIR) for public comment and input from the ICANN community. The DDIR clarified the relationship between the “fast track” process and the broader long-term process IDN ccPDP. In the report two mechanisms were identified for the selection of an IDN ccTLD and an IDN ccTLD manager. Pursuant to the Charter those mechanisms were to be developed within the parameters of:

- The overarching requirement to preserve the security and stability of the DNS;
- Compliance with the IDNA protocols;
- Input and advice from the technical community with respect to the implementation of IDNs; and
- Current practices for the delegation of ccTLDs, which include the current IANA practices.

On 11 February 2008, during the ICANN meeting in New Delhi, India, a public workshop was held to discuss the DDIR and a comment period was opened on that document.

The IDNC WG has more recently produced a first draft of the IDNC WG Methodology in the form of an [Interim Report](#) that has also been made available for public comment. Discussions on the methodology were held at the ICANN Regional Meeting in Dubai, UAE (1-3 April 2008), The RIPE meeting in Berlin , 7 May 2008 and the APTLD meeting on 22 May in Kuala Lumpur, Malaysia. A final IDNC WG meeting is scheduled to take place at the ICANN meeting in Paris.

The IDNC WG itself has conducted several face-to-face meeting (two during the ICANN meeting in New Delhi and in Geneva on 12 May 2008). The IDNC WG has also conducted several conference calls as of the New Delhi meeting leading up to Paris. The recordings of these calls are available at: <http://www.ccnso.icann.org/calendar/>.

Who	Topic	Issue	Staff Considerations
Michael D. Palage	Legal basis allocation IDN ccTLD	Concerns about authority for ICANN's actions.	<p>The introduction of IDN ccTLD is within the mission of ICANN. In particular, within the coordination of the allocation and assignment of domain names (forming a system referred to as "DNS"), in conjunction the coordination of the policy development reasonably and appropriately related with the allocation and assignment of domain names.</p> <p>The IDN ccTLD Fast Track as mechanism has a precedent in the introduction of a limited number of new gTLDs in the 2000-2001 timeframe.</p> <p>The Fast track was requested by the ccNSO and GAC, and supported as a process by the GAC, GNSO, ALAC and ccNSO, in conjunction with the acknowledgement by these constituencies that the IDN country code Policy Development Process which was initiated before and the implementation of its results will take 3-7 years depending on the outcome of the IDN ccPDP.</p>

Comments received on topics not addressed in report

Legal arrangement between ICANN and IDN ccTLD operator

Who	Topic	Issue	Staff Considerations
G. Malhas, Jordan	Agreement or Documentati on	Signing documents or agreements will delay Fast Track, due to red tape and bureaucracies in some countries.	As part of the planning for the implementation of the Fast Track process, ICANN has evaluated its current program to achieve stable agreements with country code top-level domain operators. Currently, ICANN is meeting this responsibility with its ongoing programme of voluntary Accountability Frameworks (AF).
Abdulaziz Al-Zoman, Saudi Arabia	idem	Delegation process of IDN ccTLD should not be used to “force” ccTLD to enter into agreements with ICANN. Will introduce significant delay	The introduction of IDN ccTLDs will require that a number of additional technical aspects are taken into account to ensure the security, stability and resilience of the Domain Name System. In particular it will be necessary to ensure that the IDN ccTLD manager adheres to the IDNA protocol and IDN guidelines on an ongoing basis and until a full PDP process can be completed for cc IDNs.
APTLD, as submitted by Jonathan Shea, chair of APTLD	idem	Delegation process of IDN ccTLD should not be used to “force” ccTLD to enter into agreements with ICANN. Will introduce significant delay. In many cases a “ccTLD” represents sovereignty which can not be subject to a contract with foreign company or contractual	Since the introduction of ccTLDs the circumstances and environment has changed considerably. This includes an increasing demand for transparency and accountability, increased need to ensure the security and stability of the Internet for the benefit of the local and global community, and demand to delineate the roles and responsibilities of the entities involved in the function of the DNS. At this stage of the planning process, ICANN staff seeks additional input and guidance from the community to shape a possible mechanism that includes a general description of responsibilities of both ICANN and the IDN ccTLD operator, ensures compliance with the IDNA protocol over time and associated

		relations between entities from some countries and ICANN as US based company is prohibited by law. Alternative is exchange of letters.	standards and guidelines and other standards on an ongoing basis. Further, a discussion on possible cc monetary contributions is expected as it relates to the Fast Track IDN process.
Michael D. Palage, US	Agreements in connection with Institutional confidence	ICANN must ensure that any obligations/rights/fees terms in connection with IDN TLDs are equitably accessed/imposed across all similarly situated parties within the domain name market place	
GNSO Council, as submitted by Avri Doria, chair of the GNSO	Lack of Mechanism to enforce compliance	One of the overarching requirements for introduction of IDN ccTLD is preserving the stability and security of the DNS. It is not clear how without some form of expressed understanding between IDN ccTLD and ICANN compliance to the IDNA	

		standards and IDN guidelines can be enforced. Further lack may impede ability for ICANN to transition IDN ccTLD from Fat Track to established policy.	
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Miscellaneous

Who	Topic	Issue	Staff Considerations
Alejandro Pisanty	Delegation and operation of IDN ccTLD should not impact that of (ASCII) ccTLD	Local discussion and potential changes in national law to accommodate IDN ccTLD delegation and operation could undermine or damage ability of other perfectly acceptable ccTLD manager. Provisions should be made to avoid such a possibility	The Fast Track is not intended to change current practice and relationship between ICANN and the ASCII ccTLD.
Jaser Elmorsy, BlueBridge.net	Timing of IDN gTLD and Fast Track & concerns on the operation	Fast Track only for IDN ccTLD (and not for IDN gTLD) and possibility of	Currently the aim is to launch the new gTLD process in the same timeframe as the IDN ccTLD fast Track process. However, should one of the processes be delayed then this will not slow down the launch of the other process.

	of IDN equivalents to gTLDs.	earlier launch of IDN ccTLD would put companies with businesses in territory of ccTLD in more disadvantageous position compared to early launch of generic IDN TLD (registering once versus many times)	
Andrew Mack, Principal AMGlobal Consulting	Idem	Fast Track should include gTLD as well. Risk IDN ccTLD are only possibility to register. Issues: multiple registrations costly for small businesses; grant additional power to Governments; Favouring IDN ccTLDs over IDN gTLDs; Most used gTLD extensions should move first as IDN gTLD to serve most customers and users.	See above. Also, it is expected that the Fast Track process and its specific requirements will minimize confusion between cc IDN registrations, which are for meaningful representations of territory names, with new generic names.

GNSO Council, as submitted by Avri Doria, chair of the GNSO	Idem	IDN-labeled TLDs (whether considered gTLDs or TLDs associated with countries/ territories) should be introduced as soon as practicable after technical requirements and tests are successfully completed.	See above, the processes are anticipated to be launched within the same timeframe.
Idem	Idem	Introduction of IDN-labeled gTLDs or ccTLDs should not be delayed because of lack of readiness of one category, but if they are not introduced at the same time, steps should be taken so that neither category is advantaged or disadvantaged, and procedures should be developed to avoid possible conflicts.	See above, the processes are anticipated to be launched within the same timeframe. Further, the Implementation Plan specifies the need for further work in areas for both the Fast Track process and the New gTLD Process to ensure that any conflicts between strings applied for in the two processes can be resolved in an appropriate manner. Staff is looking forward to further dialogue during and beyond the ICANN meeting in Cairo on that topic.
Idem	Security and Stability	Consideration must be given to the risks of spoofing using IDN homoglyphs	This will be taken into consideration in the Implementation Plan.

Idem	Lack of process to determine non-contentiousness of proposed IDN ccTLD	Although solicited, the IDNC WG does not recommend objection process to determine non-contentiousness of proposed fast Track IDN ccTLD. Fast Track process could hinge upon ICANN (or the ICANN board) making decisions to determine the appropriateness of the name of a country or territory to be a TLD. Comment and dispute resolution frameworks should be considered comprehensively and implemented prior to the commencement of the Fast Track application process.	This issue is closely related to the guiding principle on non-contentiousness (Principle E). The topic was extensively discussed in the IDNC WG. Because the IDNC WG did not reach consensus on this topic, the minority view was included in the Final Report. The majority view within the IDNC WG regarding the introduction of objection process were: 1. Assuming the string is a meaningful representation of the name of a territory, what possibly could be the grounds for an objection? 2. Assuming the string is selected/endorsed by the relevant public authority (as required), there was a strong feeling among a majority of the IDNC WG that the principle of sovereign equality of all States, which is part of the WSIS declaration of Principles (nr 63), is also reflected in the wording of Point E and for not including a objection mechanism. The proposed string is a matter of the relevant state/territory subject only to any overarching global policy or criteria that may exist. However, it is understood from the discussions by the IDNC WG that normal complaint processes also apply to the string selection and delegation process relating to IDN ccTLDs
Jasor Elmorsy, BlueBridge.net	User Confusion	Expectation when typing in BlueBridge.net either in ASCII or Arabic will point to BlueBridge company.	With regard to the .net extension nothing will change. This is really a question for the generic TLD process, and not addressed here. It is not expected that Fast Track cc IDNs will have any contention with current generic TLDs such as .net.

		Alienation of customer base.	
GNSO Council, as submitted by Avri Doria, chair of the GNSO	User Confusion	Confusingly similar strings should be avoided	This is an important consideration, and the Implementation Plan identifies this topic as one where additional work is necessary to avoid confusion among all new TLDs.

Annex A: Members of the IDNC WG

ALAC

- Cheryl Langdon-Orr, Chair of ALAC
- Hong Xue

ccTLDs

- Chris Disspain, chair of the ccNSO Council
- Mohamed El Bashir, .sd
- Hiro Hotta, .jp
- Jian Zhang, .cn
- Young Eum Lee, .kr (co-chair)
- Ming-Cheng Liang, .tw
- Ibaa Oueichek, .sy
- Andrey Romanow, .ru
- Bill Semich, .nu
- Jonathan Shea, .hk

GAC

- Bertrand de La Chapelle, France
- Manal Ismail, Egypt (co-chair)
- Janis Karklins, Chair of the GAC
- Members of the GAC

GNSO

- Edmon Chung, .asia
- Charles Shaban, Intellectual Property Constituency

GNSO Observers

- Olga Cavalli, NomCom Appointee
- Avri Doria, Chair of GNSO Council
- Cary Karp, .museum

SSAC

- Steve Crocker

Technical Community

- Patrik Faltstrom

ICANN Staff

- Doug Brent
- Denise Michel
- Kurt Pritz

ICANN Staff Support

- Donna Austin
- Bart Boswinkel
- Michelle Cotton
- Tina Dam
- Baher Esmat
- Olof Nordling
- Gabriella Schitteck
- Theresa Swinehart

Part B.

Notification Chairs of the GAC and ccNSO to co-chairs IDNC WG

1 Notification of Chair of the GAC

Dear Young-Eum and Manal

The Chairman of the Governmental Advisory Committee, Janis Karklins, has asked me to send this note on his behalf.

Pursuant to the IDN WG Charter, below is the text from the GAC's Paris Communiqué relating to IDN ccTLDs which will be delivered by Ambassador Karklins during the public forum on Thursday 26 June 2008.

IDN ccTLDs

The GAC welcomes the results of the IDNC Working Group towards the development of the "fast track" methodology to allow on an exceptional basis the introduction of a limited number of country code IDN top level domains. The GAC believes the IDNC WG report and the recommendations contained therein provide the basis for the development of an implementation plan, and encourages the Board to initiate that process. The GAC looks forward to contributing to these implementation proposals.

The GAC would like to stress its support for a continuation of the multi-stakeholder approach for the consideration of these matters to date, which has been useful in identifying many of the key issues in the IDNC Working Group report, issues which now need to be addressed in order to achieve the early implementation of IDN ccTLDs.

The GAC also recalls its agreement in New Delhi that the substantive public policy provisions set out by the GAC in the "Principles and Guidelines for the delegation and administration of country-code Top Level Domains" (adopted by the GAC in 2005) are equally relevant to the introduction of IDN ccTLDs, in particular the principle of delegation and re-delegation. In this respect, the GAC emphasised that it is primarily for the local Internet community, including the relevant government or public authority, to determine the manner in which a string should be selected, the manner in which a registry operator should be selected and the registry policy that should apply for the selected IDN ccTLD.

The GAC also feels that it would be inappropriate for new IDN ccTLDs to be obliged to enter into contractual agreements with ICANN, not least because this could introduce further significant delay to the implementation process.

The GAC believes that, where it is appropriate for an applicant to provide authentication of the meaning of the selected string from an internationally recognised organisation, UNESCO could be one such organisation.

The GAC is willing to contribute further to the process of developing the IDN ccTLD general policy, which will replace the fast track in due course.

The GAC welcomed presentations by UNESCO and ITU representatives regarding proposed collaboration between their organizations and ICANN to advance multilingualism and its contribution to promoting inclusion, the development of local content and increased global access to the Internet. The GAC also notes the value of such cooperation among all relevant entities toward this goal (eg. ICANN, ISO, national and regional linguistic bodies).

Regards

Donna

Donna Austin
on behalf of
Janis Karklins
Chairman, Governmental Advisory Committee

2 Notification of Chair of the ccNSO

Young-Eum and Manal,

Pursuant to the IDNC WG Charter, below is the resolution passed today by the ccNSO Council.

Cheers

Chris Disspain
Chair – ccNSO Council

Following the meeting of members today at which clear consensus was reached on the draft Final Report of the IDNC WG the Council resolves:

- I. To thank the IDNC WG for its hard work in producing the Final Report.
- II. Welcomes the report and endorses the recommendations contained there in.
- III. To ask the IDNC WG to submit the report to the ICANN Board, with the endorsement of the recommendations by the ccNSO

IV. To request the Board to instruct the ICANN staff to prepare an implementation based on the recommendations contained in the report.

The council believes that the model of the IDNC WG has demonstrated the ability of the ICANN supporting organisations, advisory committees and technical community to work together in an efficient and effective manner.

3. Copies of the comments received on the IDNC WG Final Report

The following is a complete compilation of the comments received on the IDNC WG Final Report, as encouraged in an online announcement at:

<http://www.icann.org/en/announcements/announcement-15jul08-en.htm>

"Do no damage" - Comment on IDN-ccTLD Fast Track Done

- * To: idn-cctld-fast-track@xxxxxxxxxx
- * Subject: "Do no damage" - Comment on IDN-ccTLD Fast Track
- * From: Alejandro Pisanty <apisan@xxxxxxxxxxxxxxxxxxxx>
- * Date: Fri, 22 Aug 2008 21:44:32 +0000 (UTC)

An important, crucial constraint of the IDN-ccTLD fast track process must be that careful consideration be made of the effect of starting operations of an IDN-ccTLD on the functioning of the existing, corresponding ccTLD management.

By and large ccTLD managers have been pioneers of the Internet in their countries, especially developing ones; they have steered through difficult times, creating a multistakeholder environment "avant la (WSIS) lettre", contributed to the expansion of and adherence to Internet standards, and assisted in the growth of their national Internet economies. Many of them have made it possible for the academic, technical, social, and private sectors to guide the management of the ccTLD in a proper balance with the government - a delicate balance, in general, which could be tragic to upset.

Provisions must be made to avoid the possibility that in some countries, the delegation and operation of an IDN-ccTLD, coupled with changes in laws and policies made ad-hoc, be used to undermine or otherwise damage the ability of an otherwise perfectly acceptable ccTLD manager.

A cycle of consultation within the Local Internet Community, conducted with extreme care and accompanied by careful due diligence, and without interference with national sovereignty principles, seems to be at least one crucial component of the process to provide such safeguards. What for a large, distant organization may seem opening a can of worms, may be, for a local, small entity waking up in a snake pit.

Yours,

Alejandro Pisanty

.....
Dr. Alejandro Pisanty
UNAM, Av. Universidad 3000, 04510 Mexico DF Mexico

Comment on IDN gTLDs & ccTLDs

* To: "idn-cctld-fast-track@xxxxxxxx" <idn-cctld-fast-track@xxxxxxxx>
* Subject: Comment on IDN gTLDs & ccTLDs
* From: Jaser Elmorsy <jaser.elmorsy@xxxxxxxxxxxxxxxx>
* Date: Fri, 15 Aug 2008 22:12:05 +0200

Dear Ladies and Gentlemen of ICANN,

my name is Jaser Elmorsy. I am CEO of BlueBridge Technologies, a software development company with locations in Austria and Egypt. I appreciated the opportunity to attend my first ICANN meeting in Paris in June and look forward to continued participation in a process that has major implications for my business.

Of particular concern to my company is the ongoing debate over the launch of internationalized domain names. For a company like mine with significant business in the Arab world, IDNs represent a critical opportunity to better reach and serve my customers by communicating with them fully in their native language. I applaud your efforts in this area.

But two aspects of the IDN discussion gave me cause for concern. One was the idea of creating an IDN "fast track" ONLY for country-code top-level domains, and not for generic top-level domains. The other was the notion that the IDN versions of existing gTLDs may be operated completely separately from the existing domains.

A key component of my brand is the Internet address BlueBridge.net. I look forward to making BlueBridge.net available to my customers in the Arab world in IDN format at the earliest availability. It has never been part of my company's Internet strategy to buy ccTLDs to complement our ".net" address.

We are known by BlueBridge.net and will continue to build that as our Internet brand.

But now I understand that there is a possibility that IDN ccTLDs will be made available months or even years before IDN gTLDs, under a process known as "fast-track." This would put my company in a difficult position, facing one of two unappealing alternatives. I could either ignore the needs of my Arab customers and risk offending them by failing to offer an IDN option when it becomes available; or I could incur the expense and challenge of attempting to acquire ccTLDs in all of the nations where I may do business.

I am certain that many of my colleagues in the business world would face a similar dilemma if "fast-track" were implemented in such a way that IDN ccTLDs became available ahead of IDN gTLDs.

The obvious solution from my perspective is to ensure that IDN versions of existing gTLDs are put on the same ³fast-track² process as the ccTLDs. From a domain owner standpoint, this will ensure far greater choice, simplicity and ease of use. From a user

standpoint, it will ensure that expectations of continuity throughout the IDN space can be met as soon as they become available to the public.

On a related note, I was surprised and troubled to learn of the possibility that the IDN versions of .net and other gTLDs could be operated completely separately from the existing versions. This would be disastrous for companies like mine that do business in nations that use non-Latin scripts.

Regardless of where people are in the world and regardless of what language they use, they should be able to reasonably expect that that when they type BlueBridge.net into their browser, they will come to my company's home page. That is the essential beauty of the Internet's addressing system. Should that fundamental value change, the potential for user confusion will be enormous.

The nightmare scenario for a company like mine would be if another registrant bought the Arabic version of BlueBridge.net and either deliberately or inadvertently confused and alienated my Arabic customer base.

The Internet is a tool to unite people around the world with a common network that behaves in predictable, reliable ways everywhere in the world. What this means in the IDN space is that typing BlueBrige.net should take users to BlueBrige.net, whatever language they use.

Thank you for your consideration and I am looking forward to seeing you in Cairo.

Sincerely,

Jaser Elmorsy

Legal Authority for ICANN's Actions

* To: <idn-cctld-fast-track@xxxxxxxx>
* Subject: Legal Authority for ICANN's Actions
* From: "Michael D. Palage" <Michael@xxxxxxxx>
* Date: Fri, 15 Aug 2008 14:26:59 -0400

While I fully support the expedited roll-out of IDN top-level domains, ICANN has failed to clearly articulated the legal basis by which these TLDs are being allocated in accordance with its bylaws and articles of incorporation.

Attached is an article that I authored prior to the Paris meeting, see http://www.circleid.com/posts/86198_legal_consequences_internationalized_domains/. While I appreciate some of the subtle changes that have been made in the final draft version of the fast track ccTLD IDN proposal, I believe the underlying legal authority for ICANN's actions have not been answered.

In connection with ICANN's current consultation about Improving Institutional Confidence in the organization, it is important that ICANN's action in expediting the ccTLD IDN fast track process ensure a predictable process for other similarly situated parties. Additionally, ICANN must ensure that any obligations/rights/fees terms in connection with IDN TLDs are equitably accessed/imposed across all similarly situated parties within the domain name market place. Failure to ensure such legal predictability and consistently undermine ICANN's efforts toward improving institution confidence and directly impede its stated goal of successfully concluded the JPA.

Best regards,

Michael D. Palage

APTLD's Comment on the IDNC WG Final Report

* To: <idn-ccTld-fast-track@xxxxxxxxxx>
* Subject: APTLD's Comment on the IDNC WG Final Report
* From: "Jonathan Shea" <jonathan.shea@xxxxxxxxxx>
* Date: Fri, 15 Aug 2008 15:37:58 +0800

Dear Sir/Madam,

APTLD would like to take this opportunity to thank the IDNC Working Group for their hard work and dedication in producing a methodology for the Fast Track. We would like to provide the following comments on the Final Report for your consideration.

1. The technical reference "Technical Reference Manual for the standardization of Geographical Names", referenced in the IDNC WG Final Report, does not include some countries or economies which are already in the ISO 3166-1 list and in the IANA database. (e.g. the "PALESTINIAN TERRITORY, OCCUPIED (.ps)"). It is worth emphasizing that such situation does NOT disqualify those countries or economies from joining the Fast Track, because the master reference is the ISO 3166-1 list only. Also, it is worth reiterating that the stated technical reference is only one of the three possible sources for demonstrating whether the language for the chosen IDN ccTLD is indeed the Official Language.

2. On page 7 of IDNC WG Board Proposal, the last but three paragraph says "A language is demonstrated to be an Official Language:

a. ...

b. If the language is listed as an administrative language for the relevant Territory in ISO 3166-1 standard under column 9 or 10; or c. If the relevant public authority in the Territory confirms that the language is used in official communications of the relevant public authority and serves as a language of administration."

A specification of which ISO 3166-1 standard under column 9 or 10 is being referred to would be useful.

3. The delegation process for new IDN ccTLDs should not be used to "force" ccTLDs to enter into contractual agreements with ICANN. In many cases, a ccTLD represents sovereignty or a territorial/national right and cannot be subjected to a contract with a corporation under the laws of another country. Also, for certain countries/territories, the laws of the affected country/territory or the United States may not allow the signing of a contract that involves the rendering of services by a US entity. For these and other reasons, instead of a uniform format of agreement between ICANN and the affected country/territory, an exchange of letters not violating laws of respective countries

should suffice. Otherwise, this will involve a very heavy and slow governmental process that will introduce significant delay to the implementation.

4. In Section 2.2, Bullet No.9 says

"It is demonstrated that the selected string in combination with the language/script table when being used, in for example e-mail addressees, URIs etc, does not create any rendering or other operational issues."

However, it is not clear how demonstration of "creating no rendering or other operational issues" can be achieved. The following should be clarified in the coming staff report on implementation.

- What "does not creating rendering or other operational issues" means, and
- how it can be demonstrated.

Best regards,
Jonathan Shea
Chairman, APTLD

CEO of HKIRC / HKDNR

GNSO Council Comments on IDNC WG Final Report

The GNSO Council welcomes the opportunity to provide comments to the Final Report of the IDNC WG, and applauds the ICANN Board's directive for the staff to begin work on implementation measures with relevant stakeholders to implement the fast track.

In general, the GNSO Council urges ICANN staff to adhere to the principles laid down in the IDNC Charter. Most importantly, to develop a mechanism that enables the introduction of Fast Track IDN ccTLDs "in a manner that ensures the continued security and stability of the Internet, of a limited number of non-contentious IDN ccTLDs." The proposed Fast Track Methodology identified a few good starting points. However, some areas may require further considerations for implementation:

1. Official Language & Meaningful String – The working definition and requirement for a Fast Track IDN ccTLD to be in an Official Language of the territory and a meaningful representation of the territory name provides a good framework for the Fast Track process and is consistent with the IDNC charter to "introduce a limited number of IDN ccTLDs associated with the ISO 3166-1 two-letter codes (IDN ccTLDs)." The adherence to the ISO 3166 standard and the use of internationally accepted documents such as the UNGEGN manual is appropriate and should be encouraged. Where a proposed string is not listed in the UNGEGN manual however, the proposed mechanism provided little structure for implementation. Learning from the WIPO II discussions and recommendations regarding territory names and IDNs, experience from the geopolitical names discussion in the new gTLD process, along with expertise from UNESCO should be encouraged and should inform the implementation process.

2. Request for Information (RFI) – The recommendation for an RFI to gain an understanding of the interest of territories to participate in the Fast Track will be useful for planning purposes as well as for the ICANN community. The transparency of information received, such as the potential TLD string and the interested territory, should be maintained as much as possible.

3. Ongoing Process – The concept of allowing the Fast Track to be an ongoing process is consistent with the IDNC charter to introduce "non-contentious IDN ccTLDs while the overall policy is being developed." Nevertheless, it will be important for the process to be implemented in a manner that ensures the continued security and stability of the Internet.

As such, the introduction of new Fast Track IDN ccTLDs should be processed in well publicised and predictable time schedules in order for the community, including the technical community, intellectual property rights community, and other stakeholders to attend and respond to the process.

4. Dependency on Review of Technical Standards – The acknowledgement in the Final Report that "implementing the Fast Track process as recommended, may be dependent on conclusion of [the] revision [of IDNAbis]" is appropriate. In addition to the IDNAbis, recent discussions at the technical community also indicated the need to update the IETF Standard 3 (STD3, RFC1123 –<http://www.ietf.org/rfc/rfc1123.txt>) where it specifies that "the highest-level component label [of a domain name] will be alphabetic." The

specification potentially precludes the introduction of IDN TLDs and may need to be revised. Review of IDNabis, its related documents and STD3 should be completed before the introduction of IDN TLDs.

There are also a number of issues that appear to be potentially of significant concern for the ICANN community:

A. Definition of Non-Contentious Only within the Corresponding Territory departs from current ccTLD practices – The IDNC charter specifically defined a scope for the Working Group to develop and report on feasible methods to enable the introduction of “a limited number of non-contentious IDN ccTLDs”. The proposed Fast Track Methodology definition that a “proposed string and delegation request should be noncontentious within the territory”, seems to be a significant departure from the original scope. Furthermore, such definition may be seen as inconsistent with the current ccTLD practices. The current practice follows the process of the ISO 3166-1 standard where the two-letter string is determined in an international collaborative effort. The proposed Methodology suggests introducing a method whereby a territory would unilaterally propose a TLD string. This is a significant departure from the current ccTLD practices and therefore the overall process must be designed and implemented with caution and should include ongoing public review.

B. Lack of Process for Determining Non-Contentiousness exposes ICANN to challenges from the community – While the Initial Report issued by the IDNC WG in January 2008 had solicited responses for an Objection Mechanism, and comments received had not suggested such process to be inappropriate, the proposed Fast Track Methodology did not include any process for determining the non-contentiousness of a proposed Fast Track IDN ccTLD. This would be a significant departure from the principle laid out in the IDNC WG charter. The lack of mechanisms to facilitate and process comments from relevant stakeholders could expose ICANN to challenges. More specifically it would mean that the Fast Track process could hinge upon ICANN (or the ICANN board) making decisions to determine the appropriateness of the name of a country or territory to be a TLD. Comment and dispute resolution frameworks should be considered comprehensively and implemented prior to the commencement of the Fast Track application process.

C. Lack of Mechanism to Enforce Compliance – The IDNC WG charter expressly specified that “In considering feasible methods the IDNC WG should take into account and be guided by: The overarching requirement to preserve the security and stability of the DNS ...[and]... Compliance with the IDNA protocols.” Without some form of expressed understanding between a Fast Track IDN ccTLD and ICANN, it is not clear how the overarching techno-policy requirements for IDN deployment, including continued compliance with the IDNA standards and the ICANN IDN Guidelines could be enforced. Furthermore, the lack of any expressed understanding may impede the ability for ICANN to transition Fast Track IDN ccTLDs into the IDN ccPDP process when it is complete.

The GNSO Council would also like to reiterate some of the points expressed in the GNSO Comments in Response to the ccNSO-GAC Issues Report on IDN Issues:

□ IDN-labeled TLDs (whether considered gTLDs or TLDs associated with countries territories) should be introduced as soon as practicable after technical requirements and tests are successfully completed.

□ The introduction of IDN-labeled gTLDs or ccTLDs should not be delayed because of lack of readiness of one category, but if they are not introduced at the same time, steps should be taken so that neither category is advantaged or disadvantaged, and procedures should be developed to avoid possible conflicts.

□ Confusingly similar strings should be avoided.

□ Consideration must be given to the risks of spoofing using IDN homoglyphs.

Finally, the GNSO Council would like to take the opportunity to update a previous statement in the GNSO Comments in Response to the ccNSO-GAC Issues Report on IDN Issues to the following: There may be only one IDN ccTLD string per ISO 3166-1 entry per relevant script per relevant language, but in any event no more than one Fast Track IDN per relevant language. The change reflects our understanding and respect for territories where multiple languages share a single script, such as in India.

The Final Report presented by the IDNC WG provides a good and simple framework that should work for ccTLDs. Implementation details for the proposed mechanism however, will be critical. While the Fast Track IDN ccTLD process seems to be a matter concerning ccTLDs only, the GNSO Council urges ICANN Board and staff to consider the communitywide ramifications of the introduction of these new TLDs to the social and technical fabric of the Internet. As such, the enforcement of technical standards, the maintenance of security and stability, the balanced involvement of the ICANN community, not only from the ccTLD community, the reliance on internationally accepted standards and intergovernmental processes outside of ICANN's mission, and the consideration of cost and cost recovery principle of ICANN processes, will be paramount for the success of the Fast Track IDN ccTLD process.

National Information Technology Center/JORDAN/ idn fast track

* To: <idn-cctld-fast-track@xxxxxxxxxx>
* Subject: National Information Technology Center/JORDAN/ idn fast track
* From: "Ghazwa Malhas" <Ghazwa.m@xxxxxxxxxxxx>
* Date: Wed, 16 Jul 2008 13:31:37 +0200

Dear Sir,

Below are the comments of the NITC/JORDAN on the IDN-ccTLD-Fast- Track.

- I hope that the word "experimental" does not mean temporary. Changing from the experimental to the permanent should be a smooth transparent operation for both the registrar and the registrant. Organizations or registrars who participate in the fast track experiment should be able to provide their clients/registrants sustainability, stability and security which are essential to the stability of the Internet. " Experimental" does not provide that.

- Signing documents or agreements will surely delay the "Fast Track" Signing defeats the purpose of the fast track by slowing the process and may be killing it, for some countries because of the red tape and bureaucracies.

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Jordan

Some concerns about the current fast track on IDNs

* To: idn-cctld-fast-track@xxxxxxxxx
* Subject: some concerns about the current fast track on IDNs
* From: Andrew Mack <amack@xxxxxxxxxxxx>
* Date: Thu, 7 Aug 2008 06:37:12 -0700 (PDT)

The following comment was also posted as part of the forum on IIC progress...

Sirs,

During the earlier comment period I expressed my concern with ICANN's claim that it had sufficiently dealt with two issues I think are crucial for the future of the organization – the issue of IDN rollout and the issue of non-OECD representation. And as I said at that time, while I believe some progress has been made, I remain convinced that on both counts more progress should be made before ICANN ends its current oversight relationships with the Department of Commerce.

I attended the recent Paris meeting (and speaking now specifically from a small business point of view, as a small business owner focused on international business), I was especially interested in the issue of IDNs. Some of what I saw in Paris, however, led me to believe that ICANN may have – unintentionally, I am sure – created a situation which could create real difficulty in the next phase of the development of the Internet.

While in Paris I attended the ccTLD meetings, and learned in detail about plans for the fast-track rollout of IDN ccTLDs. A welcome move. However, while I would not recommend that we slow down the IDN ccTLD process at all, I am very concerned that the much more popularly-used IDN gTLDs – the Chinese or Arabic or Cyrillic versions of .org, .com, .edu and .net, for example – were not included in the fast track.

By limiting the “fast track” to the cc space, I fear we could very well find ourselves in a situation in which, for a number of years, IDN ccTLDs will in essence be the only way to reach these new markets. Simply put, I feel this would be bad for both users and businesses on the web for a number of reasons.

First, I am thinking about the cost implications for small businesses if this occurs. Many of my colleagues and partners have businesses on the web they would like to expand into the IDN space. As small businesses, they are honestly alarmed at the time and financial implications of having, for example, to register in many IDN ccTLDs that use Cyrillic characters, or the more than 10 cc's that use Arabic script -- each with its own protocols and procedures – in order to defend their brands... instead of having the ability to compete for their brands in the IDN equivalent of .net, or .biz or .com (which many of them would rather do).

Second, I am concerned about the additional power this will give Governments in the near term – both in the business arena and in the academic/scientific space, where information sharing is essential but where there is real question about the openness of Governments over issues of human rights and the like.

ICANN is making the argument for “independence” in part based on its ability to represent the core founding principles, one of which is maintaining the close connection to the private sector in operations. The IDN rollout plan seems to call that relationship into question somewhat by favoring IDN ccTLDs.

Finally, in Paris I heard nothing that would suggest (let alone guarantee) that the most popular, most used and most business-critical IDN gTLDs would be considered first -- if they were considered as part of the "slow track" for IDN gTLDs. This simply makes no sense to ICANN as a public servant or as a promoter of growth on the web. People know and want to use certain destinations on the web -- I would like the ability to bid for my IDN gTLD, for example -- and ICANN should factor in these needs if our goal is really to support the Internet community. Based on these concerns, I must stick with my earlier position. I applaud some significant effort that ICANN has made on its way to more autonomy, but I don't think it makes sense to end the existing relationship with DOC early given the many unanswered questions that remain with the IDN process.

Thank you.

Andrew Mack

Andrew A. Mack

Principal

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Comments on the Final Report of IDNC Working Group on ccTLD "Fast Track"
Mechanisms

* To: <idn-cctld-fast-track@xxxxxxxx>
* Subject: Comments on the Final Report of IDNC Working Group on ccTLD "Fast
Track" Mechanisms
* From: "Abdulaziz Al-Zoman" <azoman@xxxxxxxx>
* Date: Fri, 25 Jul 2008 17:30:45 +0300

Dear ICANN,

Please find here my comments on the "IDNC Working Group, Board Proposal, 25 June 2008", that is posted on the following URL:<http://ccnso.icann.org/workinggroups/idnc-wg-board-proposal-25jun08.pdf>

1. The technical reference "Technical Reference Manual for the standardization of Geographical Names", referenced in the IDNC WG BoardProposal, does not include the "PALESTINIAN TERRITORY, OCCUPIED (.ps)", which is already:

- on the ISO 3166-1 list:

http://www.iso.org/iso/english_country_names_and_code_elements

- and in the IANA database:

<http://www.iana.org/domains/root/db/ps.html>

2. The delegation process for new IDN ccTLDs should not be used to "force" ccTLDs to enter into Contractual agreements with ICANN. Otherwise, this will involve a very heavy and slow governmental process that will introduce further significant delay to the implementation process.

With my best regards,

Abdulaziz H. Al-Zoman, Ph.D.
IT Consultant & Director of SaudiNIC - CITC
www.nic.net.s