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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Draft Recommendations Overall Policy for the Selection of IDN ccTLD Strings

Introduction

By the Staff of ICANN

Rinalia Abdul Rahim, At-Large Advisory Committee (ALAC) member from the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) and ALAC Executive Committee member, composed an initial draft of this Statement after discussion of the topic within At-Large and on the Mailing Lists.

On 28 September 2012, this Statement was posted on the [At-Large Draft Recommendations Overall Policy for the Selection of IDN ccTLD Strings Workspace](#).

The draft was then discussed on the [At-Large IDN Working Group Mailing List](#).

On 2 November 2012, a version incorporating the comments received was posted and Olivier Crépin-Leblond, Chair of the ALAC, requested that Staff open a five-day ALAC ratification on the Statement.

On 10 November 2012, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 votes against, and 0 abstentions. You may review the result independently under:

<https://www.bigpulse.com/pollresults?code=2734jb2TJX9rN8xEfTp2mj2>

The Chair then requested that the Statement be transmitted to the Public Comment process, copying the ICANN Staff member responsible for this Public Comment topic.

[End of Introduction]

The original version of this document is the English text available at <http://www.atlarge.icann.org/correspondence>. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail.

ALAC Statement on the Draft Recommendations Overall Policy for the Selection of IDN ccTLD Strings

The At-Large Advisory Committee (ALAC) commends the International Domain Names (IDN) country code Policy Development Process Working Group 1 for the comprehensiveness of its draft policy recommendations on the IDN ccTLD String Selection Criteria, Requirements and Processes for territories listed in the ISO 3166-1 list. We note that the recommendations are based on the previous work of the IDNC Working Group and we are pleased to see that they reflect the learning drawn from the implementation of the IDN ccTLD Fast Track Process. In going forward with IDN ccTLDs, we urge for continued transparency as well as enhanced consultations with IDN communities on all matters related to IDN ccTLD policy development and implementation.

Management of Variant TLDs: Applicability of the Root Zone Label Generation Rules

The recommendations do not address the issue of variant TLDs, but point out that the management of such TLDs are still being discussed in the ICANN community and will be added later. We believe that the recommendations should indicate that the issue of IDN variant TLDs is urgent and need to be addressed in a timely manner. Concurrently, the recommendations should affirm that the outcomes of the variants discussion pertaining to the Label Generation Ruleset (LGR) for the Root Zone would be binding and applicable to all TLDs (both ccTLDs and gTLDs) given that the overarching principle of the LGR process is the security and stability of the Root Zone, which is shared by all Internet users worldwide.

Assessment of Confusing Similarity: Focus on the Local IDN User

The recommendations consider selected IDN ccTLD strings to be confusingly similar based on their appearance to “a reasonable Internet user who is unfamiliar with the script” although “linguistic, technical, and visual perception factors” will be taken into account. We are concerned that an assessment on confusing similarity based only on the appearance of selected strings to users unfamiliar with the script may not be consistent with the nature and purpose of IDN ccTLDs, which are introduced primarily for the use and benefit of local IDN users in pertinent ccTLD territories. Without taking into account sufficient linguistic factors, problematic results may occur. We believe that further consultations with the IDN communities in implicated ccTLD territories can effectively address this issue in the policy making process.

Competing and Contentious Requests: Facilitate Dispute Resolution

The recommendations require that concurrent, competing and contentious requests for “two strings in the same language and for the same territory” be resolved “in territory” before any step is taken in the string selection process. In cases where stakeholders in territory are unable to come to an agreement, we urge ICANN to provide informational materials and case studies on best practices for the local actors to consider in their dispute resolution process or to encourage the use of any neutral dispute resolution facility for IDN ccTLD string contention. That said, it is well understood that ICANN should not act as the dispute resolution provider.

Language Jurisdiction: Consider Needs of Cross-Border Language Communities

Finally, we wish to reiterate the significance and importance of IDNs, including IDN Top Level Domains (TLDs) at both the generic and country code levels. IDNs are crucial for enhancing diversity and multilingualism on the Internet. Towards this purpose, the attribution of IDNs, especially the IDN TLD, should take into account the fact that some languages have a wide geographical distribution that goes beyond national borders and are thus not the sole property of one sovereign state alone. Due consideration should be given to protecting the rights of concerned language communities which, though falling outside the jurisdiction of one nation state, share with its inhabitants a common language or script.