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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels

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, as well as Edmon Chung, At-Large member from the APRALO and ALAC IDN Policy Liaison, composed an initial draft of this Statement after discussion of the topic within At-Large, on the relevant Mailing Lists, and at the [IDN-WG meetings in Toronto, Canada](#) during the [45th ICANN Annual Meeting](#).

On 11 November 2012, this Statement was circulated amongst the IDN-WG Members and other members of At-Large.

On 14 November 2012, a version incorporating the comments received was posted on the [At-Large IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels Workspace](#).

On 20 November 2012, Olivier Crépin-Leblond, Chair of the ALAC, requested that Staff open a five-day ALAC ratification on the Statement.

On 26 November 2012, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 votes against, and 1 abstention. You may review the result independently under: <https://www.bigpulse.com/pollresults?code=2761DwfFqEL3GWnVQ7sDpRHr>

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 IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels

ALAC Response to Project 2.1 of the IDN Variant TLD Program

Dear IDN Variant TLD Program Team,

First of all, we thank you in advance for your willingness to receive comments from the ALAC regarding your work on Project 2.1 outside of the general public comments forum. Internationalized Domain Names (IDNs) continue to be a topic of high interest for the ALAC because of their broad implications on internationalization and multilingualism, as well as their value in respecting and supporting the multi-cultural diversity of the Internet. Most importantly, appropriate implementation of IDNs (including IDN Variant TLDs), is paramount to the adoption and spread of IDNs, which in turn advances the aims mentioned above.

In reference to the published draft of Project 2.1: <http://www.icann.org/en/news/public-comment/lgr-procedure-24sep12-en.htm> on “Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels,” we commend the excellent progress of the working team since Costa Rica, and we are encouraged by the inclusion of an ALAC observer in the working team. We also commend the proposed overall framework of utilizing a 2-panel/step process in the development of the label generation rule-sets for the root. We note and agree with the distinct roles of the two panels where the first panel focuses on fulfilling linguistic and community requirements of IDN Variant TLDs and the second panel reviews and checks the impact of the first panel’s proposal towards ensuring the security and stability of the root. This is consistent with the community consensus on a bottom-up approach, which allows different IDN language and script communities to form and move at their own pace in implementing IDN Variant TLDs.

We are, however, concerned by some aspects regarding the panels, particularly pertaining to the following points on formation and accountability:

- Lack of policy expertise specified for the panels. We understand IDN Variants to be matters of policy, related particularly to implementation (i.e., they may not be technical requirements, but are demanded by users and identified/treated by operators as a matter of policy). A purely technical view of the matter may render an overly simplistic binary view (i.e., approve/reject) without enough regard to the compromises necessary to balance the strict security and stability conservativeness versus the support needed for acceptable IDN implementation from the users' point of view. The former ultimately produces a tendency to “do nothing” whereas the latter could introduce some clearly identified risks, which could then be addressed. There is a need to balance these divergent needs and the capacity for doing so needs to be in place in the panels.
- Lack of expressed accountability and review of process. The proposed processes do not have a home in any of the Supporting Organizations of ICANN (i.e., ccNSO or GNSO) and they are not subject to any accountability and review processes. More specifically, it has been proposed that the secondary-panel be composed exclusively of paid consultants of ICANN and without any review mechanism of its processes. By participating in the working team, we further understand

that the global pool of experts on the matter is also very small, which in turn raises additional concerns in the ALAC regarding the sustainability of the process and its safeguard against capture.

- Insufficient explanation of how the specific process of project 2.1 fits into the wider processes regarding New gTLD and IDN ccTLD. Even though much is beyond the scope of the project team, the way in which the output of the project fits in the overall processes at ICANN is important for all those concerned, many of whom may be New gTLD (and/or new IDN ccTLD) applicants (or aspirants). A clearer description of how current (and future) applicants and the evaluation processes are impacted should be provided.

The ALAC therefore advises the project team to:

- (1) Include specific provisions to ensure the transparency and accountability of the process. For example: a) Identify how the bottom-up multi-stakeholder framework of ICANN is used in the maintenance and review of the process (i.e. how the SOs are involved); b) Include policy and community expertise in the oversight of the processes (e.g., as advisors to the panels); c) Specify measures and potential remedies to detect and mitigate against dereliction of duty; and d) Ensure the transparency of the deliberations and formation of the panels.
- (2) Explicitly explain the problem of limited supply of the global pool of experts required for the panels (especially the secondary panel), and provide for necessary strategies and undertaking by ICANN to ensure the sustainability of the process and its integrity against capture. Furthermore, specify in more detail the qualities and requirements of secondary panel members in addition to their contractual relationship with ICANN. In our view, the secondary panel should be constituted primarily based on expertise and it should accommodate qualified individuals regardless of whether they choose to be remunerated or unremunerated by ICANN.
- (3) Publish its reports in multiple languages and ensure that the process, including the formation of panels, respects the cultural diversity of the global IDN community. More importantly, the geographical and geo-political diversity of language communities should be taken into consideration in the formation of primary panels. Concurrently, the diversity of cultural backgrounds within the secondary panel should also be taken into account.

Finally, we thank you again for your willingness to listen and to understand our concerns. We are most appreciative of the proactive measures that you have taken to ensure our community's engagement and contribution to the processes related to the IDN Variant TLD Program and all its projects.