# SWORDs are Confusing

## It's all Greek to me….

# The .ελ story

- In Feb. 2011 the application for .ελ was rejected by the DNS Stability Panel because the string was considered "confusable".

- This presentation does not intend to fully present the objections one could raise on this decision of the DNS Stability Panel.

- I rather intend to show that there is a fundamental fault underlying the Fast Track Process which needs to be revised immediately, taking into account the unexpected outcomes of some of the examined cases.

# SWORD Algorithm

- ICANN has tried to help the applicants of IDN ccTLDs by introducing the SWORD algorithm (http://http://icann.sword-group.com/algorithm/Default.aspx).

- The algorithm is supposed to find the possible similarities of a string and attach scores of Similarity to them. That way, an applicant would have the chance to preview these scores and decide on a string even before the DNS Stability Panel had to deal with it.

- On the next page I present the results for .ελ.

# SWORD and ελ

| Existing Name | Type | Similarity Score |
|---|---|---|
| ba | ccTLD | 68 |
| ae | ccTLD | 67 |
| af | ccTLD | 57 |
| es | ccTLD | 47 |
| er | ccTLD | 47 |
| eu | ccTLD | 47 |
| et | ccTLD | 47 |
| eg | ccTLD | 47 |
| ec | ccTLD | 47 |
| ee | ccTLD | 47 |
| be | ccTLD | 45 |
| re | ccTLD | 43 |
| pe | ccTLD | 43 |
| ne | ccTLD | 43 |
| ye | ccTLD | 43 |
| ve | ccTLD | 43 |
| se | ccTLD | 43 |
| ie | ccTLD | 43 |
| ge | ccTLD | 43 |
| de | ccTLD | 43 |

# SWORD and ελ

- The results on the previous slide should not be considered relevant to the .ελ. They do not present confusability issues.

- The .ελ application was not rejected because of the results of the SWORD algorithm. It was rejected because supposedly it looks confusingly similar to .ea, which is not a TLD but a reserved two character string in the reserved ISO-3166 list. Why this was not mentioned to the results? How accurate is the SWORD algorithm?

- Lets look at the possible confusability between .ea and .ελ:

# .ελ and .ea

Are .ελ and .ea

Or maybe

.ΕΛ and .ΕΑ similar?

## Not Likely…

Furthermore, according to the IDNA2008 protocol, IDN capital letters are DISALLOWED. Why was the decision based on the capital letters which are not part of the DNS?

**There is however no procedure of objecting to the DNS Stability Panel decision!**

# Fast Track

- According to the Fast Track, the DNS Stability Panel only has to reply to the applicant if the string is confusable or not. The DNS SP does not have to justify it's decision or provide minutes of the meetings or the voting.

- There is no objection procedure for the applicant.

- There is no overseeing body.

- There are no transparent rules. There are no publically available confusability tables.

# Immediate action should be taken!

- I am participating in the ccNSO Internationalized Domain Names country code supporting organization policy development process working group on Selection and Delegation of IDN ccTLDs (IDNccPDP WG 1) as a ccTLD representative for the European region.

- The Fast Track process could be immediately revised by using some of the work this group has produced.

# My Proposal for the Fast Track process revision

1. The application strings should be pre-evaluated. No applicant should have to face the cost and the work an application requires just to be rejected at the end. Each applicant could provide a number of strings for pre-evaluation to the DNS SP. The local community should decide between the strings that are technically possible to be delegated.

# My Proposal for the Fast Track process revision (ii)

2. To address the transparency issue, an open to the community process of re-evaluating the confusability criteria should be initiated. The Internet Community has to agree on these criteria, especially now that the variant issue was arisen.

# My Proposal for the Fast Track process revision (iii)

3. An objection procedure should be established, since no decision should be considered fault-proof. A Permanent IDN ccTLD Advisory Panel should be created to oversee the process and act as a final judgment point for each application that presents issues of confusability.

# Conclusion

- The Fast Track is a process that was not expected by ICANN to face issues of confusability. This was not the case.

- A Fast change of the Fast Track process seems obligatory now that we know that there are issues that need to be resolved.

- The FT process should not stop before the official ccNSO PDP is completed. The current process should be imminently amended to continue to delegate IDN ccTLDs in a Fast manner. This should be done with transparency and community input on the criteria and not the way the process works today.

# Thank you for your attention!

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