Key Points
Thank you to all that provided comments on the report concerning the 3-character restriction and the management of variants as TLDs.

Overall, ICANN Staff is currently in the process of implementing the report recommendations as follows:

- The report recommends that the GNSO and ccNSO are asked to discuss further policy issues in relation to 1-character gTLD strings. As the JIG (Joint IDN working group between the GNSO and ccNSO) had already been formed to address IDN issues, the JIG is taking this subject on. The JIG charter is being developed and it is anticipated that the JIG will get started shortly.

- The report recommendations concerning 2-character gTLDs are being built into the Applicant Guidebook and will be subject to further public comments in the next round for the AGB.

- The report recommendation concerning further variant/DNAME analysis is being planned and budgeted for within ICANN and as soon as possible a plan will be announced on this subject. In addition, since the report finalization proposals has been made in I-D’s (IETF draft RFC’s) for the development of a new Resource Record, called BNAME. This may be added to the analysis. In addition a review will be included based on the recommendations (and comments, see below) on the implement-ability of the registration policy requirements for managing variant TLDs. Included in this review is for example the determination of if/what relationship should be in place between ICANN and the IDN ccTLD manager operating a variant TLD and how these rules can be enforced.

- The report recommendation concerning the allocation (not delegation) of desired variants is being build into the Applicant Guidebook in similar fashion as is currently the case with the IDN ccTLD Fast Track process.

Summary and Analysis of Comments:

Suggestion to extend the definition of variants to include Latin-based IDN TLD names, to address multiple spelling such as: København / Copenhagen
The staff review of this suggestion has not resulted in an expansion of the variant definition. The reason being that translations of TLDs have previously been deemed not providing the right to the translated version of the TLD, regardless of the script/language used.

**Suggestion that ICANN communicates with the TC46/ISO 3166 Maintenance Agency to achieve better and mutual understanding of how each organization operates in areas pertaining to the domain name space.**

Initial communications have already taken place between ICANN and the MA. However, the comment is taken into consideration and additional communications are being planned.

**Concern that “all possible two-character ASCII codes” set is an unnecessary, and unwise expansion of the use of the alpha-2 set maintained by the iso3166/MA, a "no digits" rule may suffice.**

There is already a rule set that no strings can have trailing or leading digit. This rule is set for technical reasons and concerns about application behavior when a digit is placed in a leading or trailing position. Hence, while it is understood that this rule overlaps with the proposed rule of “all possible two-character ASCII codes” it is considered a good and initial careful approach. The statement that we have gTLDs in the root today that in some opinions are visually similar to existing ccTLDs, does not change the fact that this is an area where user confusion could exists and hence opening up for additional TLDs must carefully take into consideration and avoid as best possible the confusability towards existing TLDs.

Staff did not fully understand the concerns mentioned in relation to the fact that the recommended rules are favoring the European Union but would happily receive and consider additional clarifications.

**Suggestion to better specify the definition of variant TLDs.**

Staff understands the comments related to this subject to propose that ‘we want to use the term "variant" only where the intent is identical semantics’ and that ‘we know for sure that other systems need to be configured if the identical semantics are to be achieved’. These comments are also the opinion of the team and what the report attempted to address. When being implemented staff will attempt to further clarify this subject matter.

**Suggestion or concerns rose concerning the outlined recommendation of a set of registration policy requirements being sufficient for management of variant TLDs. Additionally a concern raised about ICANN’s capability of enforcing those rules.**

Staff will take the concerns raised into consideration in the variant analysis in relation to DNAME and BNAME methods (as mentioned above).
RESPONDENTS

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