
ICANN81 | AGM – GDS: SubPro IRT IDN Sub-Track Work Session
Monday, November 11, 2024 – 13:15 to 14:30 TRT

ELISA BUSETTO:

Hi, everyone, and welcome to Meeting #8 of the SubPro IRT IDN Sub-Track on 11 November 2024 at 10:15 UTC. My name is Elisa Busetto, and I'm the remote participation manager for this session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior and the ICANN Community Anti-Harassment Policy.

If you would like to speak during this session, please raise your hand in Zoom, and please state your name for the record and speak at a reasonable pace. Over to Michael.

MICHAEL KARAKASH:

Hi, everyone. Thank you for joining the Sub-Track of the IDN IRT. I know it's been a moment since we've met. We've had to skip a few of the past meetings because we are closely aligned with the Next Round work and the AGB topics. So usually once one is ready, we can bring it to this IRT for discussion. It says Meeting 8 here but I'm sure you're all aware that this is the fourth time we're actually meeting. So disregard the number eight there.

For the agenda, first, let me ask if there was any updates to SOIs that we would need to know about. It doesn't look like there's anything. But stop me later if you remember or you didn't hear me the first time.

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

Briefly, we're going to go across the topic timeline on what looks like the upcoming sessions will be about. We have a pretty ambitious agenda for today, but we might not get through all of the topics, but we'll see how far we get. The main topic we'll be discussing is the Base RA as noted in the earlier IRT sessions this week. And once we go through that one, we have Objections, Application Queuing and Prioritization, and Different TLD Types.

Again, as we discussed earlier, we had three IRT calls before we went through Geographic Names and Reserved Names. This is a recap for some who may not know. We also went through the IDNs topic, and we went through the String Similarity Evaluations. And today we have these four, hopefully we will get to, if not this call, we will push these topics to upcoming calls as well. So just looking here, we have a special IDN Sub-Track call scheduled for the 26th of November. The time might be a little different than the usual 13:00 UTC for this call, but we will let you know soon once we finalize what that time will be. After that, on December 5th, we'll resume the original and standing 13:00 UTC call time.

So looking at this is, this is a slide that I put together to help show us the organization and the progress we've been making on the IDN EPDP Phase 1 recommendations. So I'm going to briefly explain the color coding here. We went through multiple iterations of how to present this information, and we found that this one would be the easiest way to present this. So you can see, on the left side, we have the date discussed with the IRT. In the middle, we have the topic that is relevant to the AGB. It's mapped to the AGB sections. So when we did

our analysis and mapping, we broke down the IDN EPDP recommendations based on what topics they are aligned with and in which section of the AGB you will see these represented in. The green ones mean that they were incorporated into that topic section. The ones that are blue mean that they were incorporated in another section in the AGB already. However, they haven't been incorporated in the topic that it's aligned with right now, and we will be moving them into the green once they have been in that topic as well. So when we get to the red, those are the ones that have not been incorporated into any AGB section yet but will be, except 3.11, and 3.12 I made blue because they're relevant to application fees only. However, in different TLD types, which we'll show possibly today, they've also been incorporated there. 7.4 and 7.5 are in red because they are both pending Board action. As you know, they have not been fully adopted yet. And the gray ones down below, there's five of them, those we determined should not be incorporated in the AGB, as they are not relevant for the Applicant Guidebook, but will be implemented and put into a Consensus Policy document that we will discuss once we get to those recommendations. And on the bottom left, once I upload this slide deck to the community wiki, you can click that spreadsheet for a more extensive analysis of all the IDN EPDP recommendations and explanations that go into more detail than what you see on the slide.

So the first topic we're going to discuss today is the Base Registry Agreement, specifically Specification 14. And if you were in the IRT sessions that were held over the weekend, there was a preview. They went fully in depth. Karla, here on my right, my colleague, who was instrumental in leading the organization, the drafting of the Base

Registry Agreement, is going to give us a brief intro on how Spec 14 was drafted. Thanks.

KARLA HAKANSSON:

Thanks, Michael. Hi, everyone. My name is Karla Hakansson, and I have been the lead as far as pulling our internal team together to work on the Next Round Base RA. Just a couple of, I guess, foundational points is that we use the current RA as our template. And after months of review of all of the different SubPro implementation recommendations, we have created a draft of this Next Round Base RA. The team that was internal, as far as putting this together, included folks from the GDD Accounts and Services Team, Legal, Compliance, Policy, Finance, Technical Services. It was really, we were trying to have a very well-rounded group, cross-functional team, in order to look at all of the recommendations to make sure that we were covering everything fully. The breakdown of this is that we had 18 topics for SubPro plus Next Round implementation updates for policy recommendations that we included, as well as two ICANN Board-approved community recommendations, and then we have some operational updates that we're also proposing as a part of the Next Round Base RA. Go to the next slide, please. Thank you.

I'm not going to spend a lot of time on this slide, but this gives you a sense of the topics that we covered outside of the SubPro recommendations themselves. And you'll see I think most relevant to this group is under policy. We've got the IDN EPDP Phase 1. Not only did we look at the SubPro Recommendations 25.5 through 25.8 but

also all of the IDN EPDP Phase 1 recommendations. If you want to go ahead and go to the next slide. Thank you.

It's from this that we decided that it was the best path to take was to create a new specification. So everything related to variant TLDs will be included as part of this proposed Specification 14 which includes all of the definitions around what it means to be a primary TLD and a variant TLD, and with those together is the TLD set. That covers all of the critical functions, Material Subcontracting Arrangements, change of control assignments, registry services, delegation and testing of the TLD set, data escrow, zone file access, all of the service level agreements and emergency thresholds in Specification 10, termination clauses, as well as voluntary removal and revocation. The Fees section is still to be determined, and with the draft Next Round Base RA that was provided to the IRT, the Fees section was noted that we are still discussing that internally in order to put a proposal before the Board to make a final recommendation. Then we also have second level label allocation.

The one thing that I have tried to be very clear as far as in our conversations with the IRT is that, yes, we took the recommendations from SubPro as well as the IDN EPDP Phase 1, and we created the Specification 14. I don't know if they like that or not, but it doesn't just end with Specification 14. Because as we were developing the definitions and the requirements to include Spec 14 from the recommendations, we had to go back through the core base of the Registry Agreement and see what areas any of these definitions or requirements touched upon. So the proposed RA that we have

submitted to the IRT also includes changes or updates to the covenant section around root zone information publication and indemnification, and then it also creates changes in Specifications 3 around reporting, Specification 6 through the allocation of IDN variants, and then accounting for the 8. What's interesting is that in the current RA, there are actually references to IDN variants that have nothing to do with the variant TLDs that we now have recommendations for. So we went back through and looked at all of the incidences of where IDN variant was used and updated all of those references to avoid any confusion.

If you want to, I can just give an update on timeline. You don't need that. And then here we go. So the IRT received the preliminary draft working proposal for the Next Round Base RA. The Friday before—I think it was November 1. I'm losing time on my dates, but had it for about 10 days, understanding that they have been traveling to ICANN81, as well as in meetings already. So our expectation is we will have a number of meetings with the IRT and the RySG to review the redlines. And to make sure that any outstanding questions or issues are addressed, we will take that input, create a final proposed draft of the preliminary agreement and post it for public comment in Q1, take the input. Again, reconvene with both the IRT and RySG to draft any necessary updates. Then we will be posting it for the full Next Round Base RA as part of the AGB, will be posted for public comment In May 2025.

That's it. Happy to take any questions you might have. Did you want me to cover that last bit about the transitioning?

MICHAEL KARAKASH: Sure.

KARLA HAKANSSON: Okay. You've reminded me of one last thing. Thank you. A recommendation that we are proposing is that for anyone who wants to apply for variant TLDs and is approved for variant TLDs, the recommendation is to move to the Next Round Base RA. As I had noted in the previous slide where I talked about the elements of the RA that are impacted based on the new requirements built into the Spec 14, it's not something that we can just apply to any of the current registries on the current Base RA. So it's our recommendation that thought be considered about this and that a more prudent approach, if you were wanting to apply and be approved for variant TLDs that you move to the Next Round Base RA.

MICHAEL KARAKASH: Thanks, Karla. Dennis, I see your hand.

DENNIS TAN TANAKA: Thank you. I think Karla just answered my question. Existing registry operators might want to wish to apply for the variant TLD. So what I'm hearing is that they will be recommended to move through the new version of the Base RA, which will include the Spec 14. So this recommendation is from ICANN Org to whom?

KARLA HAKANSSON:

It's the recommendation in general. Given that there are significant changes as a part of the core of the RA itself—and thank you, Dennis, for the question, it's a great question—that it would be a challenge. We'd have to do a full amendment to an RA to include not only the Spec 14, but also update any parts of the Agreement that are touched upon as a part of the changes. So that's why our recommendation for anyone considering it is that they would move to the Next Round Base RA.

MICHAEL KARAKASH:

Thanks, Dennis, for the question and, Karla, for the introduction and the explanation of the Spec 14. Thank you.

If you've been on these calls in the past, the way we've been doing this is showing the text from the AGB and showing you mapping which recommendation is directly tied to the IDN EPDP Phase 1 recommendations, and giving the opportunity for people to either comment on that or raise any concerns that they might see. So for what I found, you'll see on this topic, it was easier to add them to the slide deck directly rather than show the entire Base RA document. Though we can switch to that, I have it ready. We can look at that. But the other topics might benefit from showing the exact document. So I'll be switching back and forth.

So the first one that we have is Recommendation 7.1. This recommendation says that “Any future gTLD along with its variant labels, if any, must be subject to one Registry Agreement with each variant label having the same Service Level Agreements (SLAs) and

other operational requirements.” So here we have Section 2.1 in the Base RA, maintenance of the primary TLD and the TLD set as being covered. Covering this recommendation, “The primary TLD must remain the primary TLD and the designation of the primary TLD cannot be changed. Each reference to TLD in the agreement shall refer to each of the primary TLD and variant TLDs individually, and this agreement shall apply in full force and effect to each primary TLD and varying TLDs as though each individually had its own Registry Agreement.” And the same text also covers 7.14. Would you like me to read it out loud or would it be for your benefit to just look at the text? Okay. This one is about the applied-for primary gTLD string. It says similarly, “Any allocatable variant label sought by an existing registry operator will be bound by the same restrictions.” It mentions the specification to the existing Registry Agreement. Again down here, it mentions that community-based TLDs, brand TLDs, geo names, as well as TLDs subjects to Category 1 safeguards. It refers to these differential treatment and requirements for those nonstandard types of gTLDs. So we will have more references to this throughout. But I just wanted to say that this text is also related to 2.1. Perfect. There’s like an effect when I change the slide, it seems.

So the next one we have is Recommendation 7.6. So this one is about the registry service provider for each of the critical functions as defined in the Base Registry Agreement. We have the critical functions down below is the DNS service, DNSSEC proper resolution, EPP, RDDS, and data escrow. So this one is tied to 2.2 in the Base RA which says, “Critical functions and Material Subcontracting Arrangements, the same entity shall perform the same critical functions as identified in

Section 6 of Specification 10 for each TLD within the TLD set.” We could look at Section 6 of Specification 10 or we could move on from. It would benefit you all to see that right now, but it might be a little more technical than what is relevant to this recommendation itself.

Then we have 7.11. “In the event a gTLD is reassigned as a result of a TM-PDDRP determination, that reassignment must include all allocated and delegated variant labels of the gTLD, if any, at the same time.” So in the Base RA, this one is not in Spec 14. However, it’s in Section E of the Base RA above. So this one, we found that it it’s more broad but it includes the variant TLD. So you can see. “ICANN may upon 30 calendar days notice to registry operator terminate this agreement pursuant to a determination by any PDDRP panel or RRDRP panel under Section 2 of Spec 7 or a determination by any PICDRP panel under Section 2, Section 3, or any other applicable section of Spec 11 subject to registry operator’s rights to challenge such determination as set forth in the applicable procedure described therein.” The way this was incorporated was more broadly for the Registry Agreement in its entirety, rather than putting this in Spec 14 specifically. If there’s any questions, definitely raise your hand or flag me. I don’t have it. It pops up sometimes, but I don’t consistently see it. Thanks. Perfect.

Then we have 7.8 and this one is about “In the event a registry transition or change of control process is initiated for a gTLD, the process must encompass the gTLD and all of its allocated and delegated variant labels, if any, at the same time.” So in the Base RA of Spec 14, we have 2.3, change of control assignment and changes to

Material Subcontracting Arrangements. “In the event of an assignment, a direct or indirect change of control or a Material Subcontracting Arrangement pursuant to Section 7.5, any such assignment change of control or Material Subcontracting Arrangement, as applicable, shall apply to all TLDs in the TLD set.” So that one is clear.

Then we have 8.4 and this one is “Applicants for a primary gTLD string and its applied-for allocatable variant labels that pass evaluation must be subject to the terms and conditions as recommended by the SubPro PDP in respect of the timeframe for delegation, including the ability to apply for an extension of time for delegation.” So this one is mapped out in Section 2.5, which is on the delegation of the TLD set. And here you’ll see that “The registry operator shall complete all testing and procedures for delegation for all of the TLDs in the TLD set within the timeframe specified.” And it references 4.3(b) of the Base RA. “Provided, however, that if registry operator fails to complete all testing and procedures for delegation for any variant TLD, then such variant TLD shall be removed from the TLD set or for the primary TLD, then each TLD within the TLD set shall be deemed to have failed and ICANN may terminate the agreement pursuant to Section 4.3(b).” If I’m going too fast—sometimes I tend to speak quickly but you can tell me to slow down. Thanks.

For 7.12, “The same data escrow provider must be contracted for the gTLD and its allocated and delegated variant labels.” So here we have 2.6 on data escrow in the Spec 14 text. “Registry operator shall engage

with the same escrow agent for all TLDs in the TLD set in accordance with Spec 2.

71.0 is on the EBERO provider. “Emergency transition of a gTLD to an EBERO provider must include the allocated and delegated variant labels of that gTLD, if any, all these labels must be transitioned to the same EBERO provider at the same time.” So we have it as emergency thresholds Section 2.8. If any one of the events set forth in Sections 1 through 5, Section 2.13 has occurred such that an emergency transition is required for any TLD in the TLD set, then each TLD within the TLD set shall be deemed to require an emergency transition and shall be subject to Section 2.13.

I could go to the document if you would like to see what falls under those but it might not be needed at this moment. Yes, Justine?

JUSTINE CHEW:

I think, in principle, application of Recommendation 7.10 works with what you have proposed. The only other thing that is still outstanding, I believe, is in clause 2.8 itself what is considered as an event that would trigger EBERO. And I think in the IRT plenary, we’re still discussing that, right? So just a note on that. Thanks.

MICHAEL KARAKASH:

Perfect. Thank you. Would you like to look at what it’s referencing above in Section 2.13? I mean down below. Sorry, yeah, you’re right. We’re still discussing. Okay. I’m going to go back to that. It sounds like the mics aren’t on, but if you can’t hear us, or if you’re in the Zoom

Room and you're not in the room, please let us know and we will try to fix that. Okay. Thank you.

Okay, moving on to Rec 8.13. "In the event that a gTLD is removed from the root zone as a consequence of its registry operator's breach of the Registry Agreement, the rest of its variant label set, if any, must also be removed from the root zone." So we have 2.10 on termination. "If any one of the events for termination set forth in section 4.3 has occurred such that ICANN may exercise its right to terminate the agreement for any TLD in the TLD set, then each TLD within the TLD set shall be deemed to have reached the same termination event."

And then for 8.10 we have—I think I may have carried that over. Sorry about that. "Each primary gTLD that has been removed from the root zone, either voluntarily or involuntarily, must also require the removal of its delegated variant labels from the root zone." So for this one, we have 2.11 on the transition of registry upon termination of agreement. "In the event that this agreement is terminated and any TLD in the TLD set is removed from the root zone pursuant to Section 4.5, then each TLD within the TLD set shall also be removed. And in the event any TLD is transitioned to a successor registry operator, then each TLD within the TLD set shall be transitioned to the same such successor registry operator." Perfect.

Then we have 8.11. "A delegated variant label that is voluntarily removed from the root zone will not require the removal of the associated primary gTLD or its other delegated variant labels." So here we have 2.12, voluntary removal and revocation of variant TLDs. "Registry operator may request to remove one or more variant TLDs

from the TLD set. In the event that domain name registrations exist at the second level under the delegated variant TLDs, such request must include a transition plan for the existing domain name registrations under the variant TLDs to be submitted to ICANN for its review and approval. If an amendment to this agreement removes a variant TLD that is delegated in the root zone, then that variant TLD alone shall be removed from the root zone. All other TLDs in the TLD set shall remain delegated. If no variant TLDs remain, the provisions of this Spec 14 shall thereafter no longer have any effect.”

Okay. We had discussed this already, so I’m not going to go into it further, but it was regarding the Spec 14 versus adopting the Base RA. That was all that was from the Base RA that we’ve included. Perfect. Any questions in the way that they’ve been written and adapted into the Base RA and Spec 14? It doesn’t seem like there were any concerns, definitely. Okay. Perfect. Thank you to everyone who was instrumental in drafting and assisting with both the recommendations and the Base RA Spec 14, and Karla for explaining the way that we went about it. Perfect.

Now we’re going to pivot to objections. And for those who were part of the full IRT as well, you know that this went through a few iterations. We’ll see how they’ve incorporated the IDN EPDP recommendations now. Okay. So the way I did this one is I put the recommendations on the slides so you can see quickly. I’ll show you which ones we deemed relevant here, and I’m going to pull up the actual AGB section which has the mapping done directly on that one.

So for this, we found 5.1, 5.2, 5.3, 5.4, and 5.5 of the IDN EPD recommendations were about objections. So we can look at all applied-for allocatable gTLD variant labels must be subject to the objection processes is the overall idea in Rec 5.1. There are some details on a string confusion objection and how they may be filed based on the confusing similarity between combinations of the applied-for primary gTLD strings and the variant labels. There's the various iterations down there.

5.2 is quite a mouthful, and it's continued on this next slide. We have 5.3 and 5.4 on this slide. These are about the outcomes of string confusion objection, ensuring they're consistent with the 2012 Applicant Guidebook with specifications on these various options down below. Then we have a 5.4. This one is in respect to the limited public interest objection, legal rights objection, and the community objection, noting that they may be filed against only the applied-for primary gTLD strings and/or the applied-for allocatable variant labels. And lastly, we have Recommendation 5.5, and this one is with respect to the limited public interest objection, legal rights objection, and the community objection. It presents the three possible outcomes in more detail there.

So now I'm going to switch to the actual AGB draft language. Let's zoom in here. Perfect. Okay. So I have them flagged on the right side. Okay, perfect. This is better.

So we have 5.1 represented in this paragraph here. "All applied-for gTLDs and applied for allocatable gTLD variant strings will be subject to the objections processes." That's verbatim from the

recommendation. “Additionally, for string confusion objections, only blocked variant labels will also be subject to the objection process.” And that’s also 5.2 as we just saw.

Moving down, again, 5.2 is also represented in this paragraph here. So it was determined that the best way to represent the information, many ways were discussed, but this was found to be the most clear. So here so here you can see “A party withstanding who believes that the applied-for primary gTLD string, its allocatable variant label, or its blocked variant label is confusingly similar, either visually, orally, or in meaning to an existing TLD and/or another applied-for primary gTLD string and/or any of its allocatable or blocked variant strings may file a string confusion objection.” So this accounts for all the possible permutations as described in 5.2.

Also down below we have “The only exception to the above that cannot form the basis of a string confusion objection is that of a blocked variant label being claimed as confusingly similar to the blocked variant label of an existing TLD or another applied-for gTLD string.” Okay. Then here as well, “It should be noted that for the case of visual similarity, the objector must refer to the guidelines for visual string similarity.” As you can see, it’s using the recommendations and it’s converting them into text form. It’s not all together in one section, but it’s split out to make the most sense in the mapping of this document and the language. Perfect.

Moving down, we have Recommendation 5.4, represented here in the grounds for objection on legal rights. So this one has been pulled into different sections, and we’ll show you how. The first one is about “The

objection cannot be filed against non-applied-for allocatable variant strings or blocked variant strings,” as noted. Here on the limited public interest, “The objection cannot be filed against non-applied-for allocatable variant strings or blocked variant strings.” And then again, it’s pulled into a separate community section. “The objection cannot be filed against the non-applied-for allocatable variant strings or blocked variant strings.” So instead of putting one sentence and then saying which three they fall under, we decided that it would be best to break it down into the various categories so it’s more clear.

Okay. Moving down, just to make sure I didn’t miss anything. Sorry if anyone’s getting dizzy by the scrolling. I believe that was the last one. Perfect. Thanks, Karen, for providing the explanations of the various abbreviations we have. So that was all of them, 5.1 through 5.5 on objections. Any objections to the objections? No? Okay.

So we’re going pretty quickly through these ones, so we might get through the entire agenda today, actually, which is great news. So the next topic we have is Application Queuing and Prioritization. So for this one, there was one recommendation noted that is relevant to this AGB topic. This one was on Rec 3.15. That recommendation says, “As a one-time exception for the immediate next application round, applications for allocatable variant labels of existing IDN gTLDs from the 2012 round must receive priority and processing order ahead of all other new gTLD applicants, including the IDN applicants that elect to participate in the prioritization draw.” So in this section, that is still a work in progress, though this text should be unchanged, it should remain as is. “As an exception for the immediate Next Round, you can

see applications for allocatable variant labels will be processed ahead of the all other new gTLD applicants, including IDN applicants that elect to participate in the draw. Due to the small number of expected applications in this category, these applications will be processed separately and will not receive a priority number.” So the full IRT will again be looking at this language once it’s finalized. But this is how 3.15 is being incorporated here. Any questions? Comments? Okay.

So this is the last topic we have on the agenda for today. I know we have a longer time allotted for this session, but if we need it, we can use it, but if we don’t, we will not use it. So for the different TLD types, we have 3.11, 3.12, 3.15, 3.16, and 7.7 identified for this section. So on this slide, you’ll see 3.11, “A future applicant applying for a primary gTLD string and up to four of that string’s allocatable variant labels during an application round must incur the same base application fee as any other gTLD applicant who does not apply for variant labels in that round.” Again, I’ll show you the text language. I’m just showing the recommendations now.

This is another document that does not have the stamp of being finalized yet, but you can be seeing how these recommendations are being applied in that document and you can provide feedback as we’re working through it.

3.12 as well. “Any applicant applying for more than four allocatable variant labels of a primary gTLD string in an application round may incur additional fees that ICANN Org considers to be proportionate to any additional costs associated with evaluating the application and consistent with the cost recovery principle.”

And 3.15, “As a one-time exception for the immediate next application round, applications for allocatable variant labels.” I’m not going to read this one again because we just read it. But this one was connected to the one that we just looked at for prioritization.

And 3.16, this one is about “The allocable variant labels being subject to the same application requirements and evaluation criteria.” And then down below, you can see the three non-standard application types of gTLDs as identified, and more specific comments on those brands, geo names, and community-based TLD strings.

Then we have 7.7 which we already discussed in the Base RA discussion, but it’s on the critical functions, and this is also mentioned again in the different TLD types. So going to that document, we can see here, starting with 3.16, we have “Applications for variants of existing TLDs must comply with the requirements defined in the IDN Section,” which we reviewed on our second call, “and can expect to find different requirements in the following areas of the application cycle.” And then down below there is more details.

So 3.15, “The applications for variants may be given priority in processing over applications for non-IDN strings there.” Again, as noted in the Application Queuing Prioritization section.

Moving down, 3.11 is incorporated here on fees. “The existing registry operators that are applying for variants of existing TLDs only will have the base application fee waived for up to four variants.”

And then here we have 3.12. “Applications for more than four variants may incur additional fees.” And 3.16 is also mentioned down below

here. “Applicants will have the opportunity to apply for a new IDN TLD, primary TLD plus its variants. Applications for new IDN TLDs and its variants must comply with the requirements defined in module section IDN and can expect to find different requirements in the following areas of the application life cycle.”

Here down below, we have again 3.15 mentioned in application queuing. And 7.7 mentioned here, as was noted in the Spec, 14, “Additional requirements may apply such as using the same RSP for the variant registry as the primary registry and the TLD types are the same across primary and variants.” 3.11 is referenced down here once more on the fees. So, as you can see, it’s broken into applications for new IDN TLDs, and above is applications for variants of existing TLDs. So it was repeated in those sections as well. Justine, go ahead.

JUSTINE CHEW:

Thank you. I think one thing you may want to consider is wherever you talk about variants or up to four variants, to precede the word variants with the word allocatable so that it’s clear that people can only apply for and get an allocatable variant and not a non-allocatable variant. Thank you.

MICHAEL KARAKASH:

Thanks, Justine. Noted. I will bring that back to the team for revision there. Thanks.

I see there were some questions in the chat on objections. Let me take a look. One moment. I think the first one was from Edmon. “Other

objections may need to be open for blocked variants, given a particular primary string in the case, for example, a bad faith attempt in applying for a primary string that results in a blocked string being a trademark. In that case, the trademark owner should be able to utilize in TM objection.” We will also be taking these comments and questions back to the team and looking at these as well in the context of objections.

Dennis responded. “The TM owner is also a TLD applicant. The two applications would be put in a contention set.”

Edmon provides a good example. “It would be those characters which would cause the brand name Rakuten to be in blocked variant, but if they do not apply.”

“So if they do not apply, would they have grounds for objecting?” is a question that Dennis is posing.

Then Edmon, “A trademark owner should not need to apply to have standing to use the rights objection.”

Karen provided a clarification. Thanks, Karen. “A rights holder can file a legal rights objection. They do not need to be an applicant to object.” That’s the clarification.

Of course, we’ll be saving this chat and taking all of these back to the team and discussing them as well. Perfect.

Any other questions, comments, or concerns? Can I go back down here? Nope. That was all of the texts that we had ready from the Applicant Guidebook sections to show you how the IDN EPDP Phase 1

recommendations have been incorporated. And from the lack of concern so far, it seems that we've been accurately conveying that language in the Applicant Guidebook text. But if you think of anything or if there's something that comes to mind later, definitely use the mailing list as well as the next IDN IRT Sub-Track call to bring those concerns as well, or comments that you might have or suggestions.

So going back to this slide, I just want to ensure that we have everything discussed that we wanted to discuss here. I wanted to put in a little plug for the upcoming IRT meetings that are left here at ICANN81. We have one on Wednesday, November 13 at 13:30 UTC on Community Priority Evaluation, also known as CPE. If you would like to join, you should join that as well. And after that, we have another on Thursday at 06:00 UTC on Outreach and Engagement. And as a reminder, we have our next IDN IRT Sub-Track call on the 26th. We will soon be circulating the time and the topic for that to ensure that it is of interest to you and you're present at that call, and we'd be resuming our again our regular 13:00 UTC calls on December 5th.

Oh, I wanted to put these in so you knew which ones we were referencing. These are the ones we determined that are not relevant to be included into the AGB. They were 7.9, 8.1, 8.2, 9.1, and 9.3. Look at them here, and I'm going to upload these documents and the slide deck to the wiki, and we'll be sending around the recording as well, so you can take another closer look at these and provide us with any comments or concerns you may have.

We have a few minutes left as well but that concludes my portion of the recommendations analysis here. But if you have any more

comments or concerns, you can definitely raise them now or you can bring them later. Yes, Dennis?

DENNIS TAN TANAKA: Thank you, Michael. Question. So we've seen Spec 14 which is entirely for IDN variants. But I believe Karla also mentioned there are other changes applicable to variant TLDs in the other parts of the Registry Agreement. I'm not part of the IRT, so I don't know that. Is there a way to identify those changes?

MICHAEL KARAKASH: Yes, we definitely can. So all the recommendations have been mapped to both that section and this one as well, but they're tangentially related to IDNs. However, they're not directly related to the recommendations, if that's clear. But we will be communicating any of those changes, and it will be going through the Public Comment as well. And you have access to the Base RA document, so if you look through that, we could also provide. We'll be meeting with the Base RA team, and I'm also on those calls as well to ensure that the IDN recommendations are being incorporated. And I can bring that to this team so we can look at any changes that may come up.

DENNIS TAN TANAKA: Thank you, Michael, for that. Follow-up question. IDN EPDP Phase 1 Report is being incorporated. Phase 2 is still in the works. Are there plans to ingest those recommendations in some way, shape, or form in

the AGB, or that's for future work, changes, amendments, what have you?

MICHAEL KARAKASH:

Sure. That's a great question. For the AGB, we're only incorporating the Phase 1 recommendations, but there will be other consensus policy documentation that we will be ensuring that we'd be working on a separate IRT here to be discussing the Phase 2 recommendations once they go through all the proper channels and approvals. Both great questions. Thanks. Any other questions?

Well, thank you, everyone, for attending this call. I hope you continue to attend the future IRT Sub-Track calls. And if you would like to be added to the mailing list, please reach out to me and we will be sure to get you on that and make sure you have all the documents and e-mails that come through. Thank you.

[END OF TRANSCRIPTION]