

COPENHAGEN – ICANN GDD: IDN Implementation Guidelines WG Update Sunday, March 12, 2017 – 09:00 to 10:15 CET ICANN58 | Copenhagen, Denmark

- UNIDENTIFIED MALE: It is 9:00 a.m. on March 12 and this session is the GDD IDN Implementation Guidelines Working Group.
- SARMAD HUSSAIN: So, welcome to the IDN Implementation Guidelines Working Group session and I will hand it over to Mats Dufberg, who's one of the co-chairs of the Working Group, to take us through the session. This is Sarmad.
- MATS DUFBERG: Thank you very much, Sarmad. I'm Mats Dufberg and, as he said, the co-chair of this Working Group. Background. We will go through these bullets in the presentation. So, the purpose of the Working Group is to create a guideline for IDN registrations. And the guidelines are for registrations on the second level – that's the focus; not for the root zone. That's a different work on deciding what the limitations and the practice should be for the root zone.

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. And the goal is to minimize the risk of cybersquatting and confusion, and confusion for the users. So, the work that we do is relevant for gTLDs – the registries and registrars that offer IDN on the second level. But it's also relevant for any other TLD offering IDN (i.e. for ccTLDs). And the work can also be used on lower levels. So, if you – within your domain – use IDN, these guidelines could be used, also.

So, we have created a final draft for public comment that was released a week and a half ago, and you can see of the slide that we have presented material on previous ICANN meetings. And this group consists of representatives taken from different groups within ICANN: ALAC, ccNSO, GNSO, and SSAC – and you see the names on this slide.

So, we have met regularly every week or every second week to discuss the progress of these guidelines. So, yes, the recommendations that are within the guidelines, or the draft guidelines are divided into these six categories:

Transition (that is transition, for example, from previous version of IDNA); Format of IDN Tables; Consistency of IDN Tables; Variants; Similarity and Confusion; and then the last, Terminology.

And we use the keywords "must", "must not", etc., as interpreted in the RFC 2119. Since this document will be binding



for gTLDs with contract with ICANN, the selection between the keywords is quite important.

Okay. So, the first recommendation here says that "IDN should conform to IDNA 2008 as defined by these RFCs – standard track RFCs 5890, etc.

And this is quite important that we stick to the 2008.

The second is about the transition from 2003, and what we say is that we should move away from any code point that is permitted in 2003 but is not permitted in 2008. So, yes. We should not allow the old IDNA 2003.

So, recommendation number three is about where there are existing domains, IDN domains that do not conform to IDNA 2008. So, what we say is that it is not acceptable to keep those. There must be some kind of transition to move away from anything that is not compliant with IDNA 2008. So, not even an exception we should accept the old format or the old code points.

Number four is stating that the prefix used by IDN – the something, something, dash, dash – must be reserved for a valid A label. So, the only time where you may have the hyphens in position three and four is when it's a valid A label under 2008.



Okay. And so, what should happen then if there is a need for transition. This is a quite long recommendation. It continues on the next slide. I don't think it's reasonable to read through all the bullets, but the recommendation states that the registry must publish a plan for transition. So, it makes it possible for registrants and other interested parties to see what happens.

Okay. And then we come to the next part, the format of IDN tables. So, what we say here is that registry must publish a repertoire of code points, and also it must also publish what it's intended for – for which language or script. And also, it must publish the variant rules and policies. So, it must be to determine from that document what is an acceptable label under that TLD.

IDN tables for TLD or gTLD must be published in the IANA Repository and we now have a standardized format for IDN tables called Label Generation Ruleset (LGR), defined in RFC 7940. And that is the primary format for IDN tables. That's A.

We also say that registries that use the registry format may still keep the old format; but it's, again, the IDN table must include everything needed to determine if a label is valid for that IDN table or not.

Okay. We think that consistency between IDN tables for the same language under different TLDs is something which is good



for the users. And therefore, we encourage registries to collaborate to make, have a shared view of what is a good table for a certain language.

In number nine, we recommend TLDs to use the reference tables that ICANN publishes. We say that it may deviate, so it's not that you must keep them, but the goal is to try to use the reference tables as the standard. And these reference tables will probably evolve in the future. They're not set right now. They will be set before the guidelines are published. And then in the future, they will evolve. And the registries that use IDN tables with the languages that are within the reference set, they are encouraged to cooperate and contribute for that involvement of the tables.

And anything that is needed to understand the policies must be published. Then we come to the next topic: IDN variants. When variants are allowed in the table, they must be allocated the same registrants or they must be blocked from registration. So, variants should not be registered by different registrants, and only variants with a disposition allocatable should be included in DNS. And this is very much LGR-centric. So, we see LGR as the format of IDN tables for the future. And they're allocatable is one disposition that you can get.

And then we have the question of activation. Should it be activated automatically or not? So, in the normal case, variants



should only be activated on request by the registrants through the registrar. But that is except in cases where a registry has established a norm to have an automatic activation.

For example, in Chinese TLDs, that's such an example where they have a norm of activating directly. But that must be explicitly expressed so that you know that this will happen when you register a domain.

And this continues here. So, this registry side approach – that means that the registry automatically activates certain variants. They require that a registry is careful and follow advice from SSAC and others.

And then we come to Similarity and Confusability of Labels. So, first bullet is about commingling – or first recommendation I about commingling of code points from different scripts. And the main rule is that a label should only consist of code points from one script. There are exceptions, and those are exceptions for languages that have a tradition of commingling code points from different scripts.

Japanese is a good example of commingling hiragana, katakana, and Han. So that is, of course, acceptable. It is not acceptable to say commingling Latin and Cyrillic in the same label.



If a TLD has several IDN tables with the same script – for example, a Japanese table and a Chinese table, both of them have Ha – then and then the registry must ensure that the Han code points have the same variant rules. It works the same independent of Japanese or Chinese table.

Then we have request cross script homoglyph. So, what this means is that there are code points in different scripts that have the same shape. One example is that you can find in Latin and Cyrillic – you can find in Latin A, there's a code point in Cyrillic that looks exactly the same, and the registry must make sure that it's not possible to register two labels – one in Cyrillic and one in Latin – that look the same under the same TLD, of course.

So again, when different scripts are mixed, then it's very important to look at the risk of confusion between code points. And here's a long text. I will leave that for the reader to look at. I mean, this presentation is available online.

And then we have Terminology in Appendix B.

So, these are the six topics that are covered in the guidelines. We have not covered question of registration data – what should be there. It's outside of IDN, we think, and we have no recommendations when it comes to EVP and how that should be handled. Any IDN-related issues around EVP. We have left that out from our recommendations, guidelines.



So, as we've said, the document is available and open for public comments as well as comments here today and it's open until the 24th of April. We will incorporate and review of all the feedback received, and we encourage all participants today to go through the guidelines and send in comments to us. And when we have updated the guidelines, we will send it in to ICANN Board – I think – for approval, and that will then be published as the IDN Implementation Guidelines Version 4.

So, here are details where you can find the guidelines in our wiki page, and also the email address to reach the Working Group. So, I want to open the floor and the remote participants for question and comments.

EDMON CHUNG: Edmon Chung here jumping in. Perhaps I can encourage those sitting at the back to sit up at the front. There are plenty of seats up here and it's closer to the mic. I'm hoping to encourage some discussion here. Again, just emphasizing a point. This is out for initial public comments and we are looking to try to finalize it, so if there are big gaps or there are places where you think we need to focus our attention on, this is time to bring it up.

MATS DUFBERG:

Yes, please.



KUO-WEI WU:	I'd like to ask –
MATS DUFBERG:	Please state your name.
KUO-WEI WU:	This is Kuo-Wei Wu, actually, from Taiwan, and I was just retired from ICANN Board from last year. And I'd like to know on IDN variants, if the IDN variant is accepted by the ICANN, how the registry will charge for one price or multiple price and who will make a decision on these pricing issues?
MATS DUFBERG:	Okay, so you said if ICANN accepted a variant. Are you talking about a variant TLD or a variant SLD?
KUO-WEI WU:	I'm talking about the IDN variants.
MATS DUFBERG:	Under a TLD.
KUO-WEI WU:	Yes.



MATS DUFBERG: Yes, okay. I don't think that ICANN has the need to approve or disapprove... Well, registry agreement states if you're allowed to have variants, yes. So, the pricing is out of the scope of the IDN Working Group. I don't know if Sarmad can say anything about pricing.

KUO-WEI WU:Can I take an example so that people would be more understand<br/>detail what I'm saying.

MATS DUFBERG: Yes, please. Go ahead.

KUO-WEIWU: For example, if the IDN variant is accepted by ICANN and says, "It's okay to go," and then I think the consumer or somebody willing to be a registry in the future, he will face issue like because the variant mean is a one name you can have at least two or maybe or maybe four different unit codes mapping into that. So, if that case, if I try to apply an IDN and I also want to apply on the variants, should I pay for one or two? That is my [question].



MATS DUFBERG: Yes, I understand your question. So, in principal, what you do in variants that you register one name but you get two or more names. From a DNS perspective, you add more delegations. Sarmad, can you? Okay.

EDMON CHUNG: It's Edmon Chung. So, I think it's important to... First of all, I think this is a very important question. However, this particular working group and the IDN Implementation Guidelines is a very special document at ICANN because it covers both gTLDs and ccTLDs. So, I am guessing that pricing issue may be relevant for gTLDs but definitely not so relevant for ccTLDs because that's probably policy within the ccTLD themselves.

> However, the question, perhaps, for the group is whether we want to take this on and discuss a little bit further. Perhaps, I guess, from Kuo-Wei's point of view is we haven't really touched on it and should we cover it and then say, "Hey, this is something that the CCs and Gs should spend some time on.

> Because on the G side, it's probably going to need to be GNSO policy. On the CC side, up to each ccTLD. So, this particular document, I can't foresee that us having a definitive say, or saying anything definitive here – but it may be useful for the Working Group to think more about it.



KUO-WEI WU: Edmon, I'd like to comment that. Sorry, but I respond to Edmon's comment. I think the pricing always is a part of the policy. It's critical. Right? Because if I try to apply a IDN and if, eventually ICANN going to charge me the new gTLD in variants, I need to pay two or three prices instead of one. These are major differences.

> More than just the registry or registrar, even to the end user, the registrant, I need to pay one or pay two or pay three. You have to let me know because that is a very critical policy decision in that part of that. You cannot ignore the price.

EDMON CHUNG: Right. I mean, variance is nothing new. I mean, we already have variance under the gTLDs. So, ICANN must have some position on how that is charged. Do you know?

Okay, please.

ANDREW SULLIVAN: My name is Andrew Sullivan. I don't see any reason why this is any of ICANN's business. This is a registry policy issue. Registries can make decisions about how they want to run their registry, and it is way beyond ICANN's mission to make any decisions



about how registries price their products. If registries want to charge the same registrant multiple things...

The policy here already says that if a variant is generated, then either it has to be registered to the same contact, the same registrant contact, or it has to be blocked.

So, there's no question that the thing is going to go to somebody else. You don't actually have the problem of ambiguous delegation. And everything else beyond that is a question for registry policy. Now, some registries will decide well, they don't want these things to work and they don't want the burden of the additional delegations that they have to maintain and so on, and they are in a position to do that.

Other registries will say, "Hey, we want to support this or that language and we want this to work naturally." And I think that we will see fairly quickly that some of these are going to be more successful strategies than others and then the market will solve the problem. But I think making a policy about this on ICANN's part is really interfering in the operation with this.

MATS DUFBERG: Okay. The question is still, how is working today? And that's why I'm trying to ask Sarmad. Do you know if ICANN charges one or multiple for when variants are activated? Because ICANN – if you



have a gTLD, you pay ICANN for every registered domain name. Okay? And how are domain names with variants charged? Do you know, Sarmad?

SARMAD HUSSAIN: Unfortunately, I don't have that information right away, so.

MATS DUFBERG: So, independent of what we think, there is some policy today and I think it would be relevant for this discussion to know. So, if anyone listening to this, please tell us how it is.

KUO-WEI WU: Yes and no. Actually, I do. [You] response to Andrew you are talking about. You are talking about to the registrant. I agree. That's a registry right. But I'm asking another part. If a gTLD, I'm going to apply the variant. I want to know ICANN going to charge me another [\$185,000] again or that's it? So, it's a part of ICANN role. He need to tell us.

MATS DUFBERG: No, I'm sorry. Now you're talking about variant TLDs. That's a different story.



KUO-WEI WU:	[inaudible]
MATS DUFBERG:	So, no.
KUO-WEI WU:	[inaudible]
MATS DUFBERG:	No, it isn't. Here we're talking about the variants <i>under</i> a TLD but you are talking about the variant TLD. So, I think that this working group will not discuss variant TLDs because that's handled in a different workgroup session.
KUO-WEI WU:	Well, [inaudible]. It's always is one of the reason of IDN variants. There is [two-tier] [inaudible] just Andrew say is to the registrant. I fully agree your point. But if you actually a TLD operator, and now if a variant passed, I want to know. I'm the TLD operator right now – IDN TLD operator now – variant is passing. Is ICANN going to charge me for additional one? Or that's it? [inaudible]



MATS DUFBERG: I don't think this pricing discussion is within the scope of this working group.

Yes?

ALAN HUME: This is Alan Hume from [inaudible]. Actually, I'd just like to add up to what Kuo-Wei said. With respect to the second level variant registrations, actually this [does] – has some [predernation] with the pricing. For example, for Chinese domain names, second level variant registrations – I think the specific question is if ICANN is going to charge one transaction or two or multiple transactions for the variant registrations?

That is a question for ICANN, number one. And then number two \_

MATS DUFBERG: I'm sorry. This is a question for ICANN, definitely. It's not a question for this working group. We have not discussed any charging.

ALAN HUME: I think it's pertinent, but I don't know if it's under [relevance] of this working group.



And the second thing regarding the pricing is about the IDN and TLDs because, currently, the IDN TLD and variant IDN TLD is still yet delegated by ICANN. And if ICANN is going to delegate it to the variant TLD to the current registrar operators, what will be the pricing of the ICANN side to gTLD registry operators? It's the second question. Maybe that is out of scope right now, but the number one is definitely pertinent right here.

MATS DUFBERG: All the questions about charging are very important. I agree with that. But it is not within the scope of this working group. So, we have to have some limitations on the work that we cover. Yes.

EDMON CHUNG: Edmon here. So, I think those are important questions, but I want to clarify one thing. In terms of what is happening today, if the negotiations with ICANN and the registry agreement for gTLDs was done correctly an – which we covered this particular topic – then it's about registration. Registration ICANN charges a fee for every registration or renewal.

> Based on these IDN guidelines, it means that the variants are not registrations. They are activations that delegate to the DNS. So, ICANN today – at least for the registries that I help – do not pay ICANN extra money for every variant activation. And I think that



is correct in the registry agreement, which I helped negotiate. And this particular point was brought up in those negotiations.

So, I want to clarify and set that straight because it's based on registration of domain names, not based on activation of variants. So, that's one of the...

And how it relates to this particular document is by defining that the IDN variants are not registrations. They're actually, they have to be allocated to the same registrant and their activations and delegations in DNS and not registrations, and that may be something that we should clarify in this document. Rather than touching on the specific subject of pricing, this may be one of the ways to address some of those issues.

So, I wanted to respond, also, back to Andrew. So, we're talking two things and probably you can figure it out as well. One is how the registry charges the registrar and registrant, and one is how ICANN charges us.

And on the TLD level, I think that needs to be policy discussion at the GNSO and ccNSO separately. This group probably doesn't have the right makeup to make those decisions. We can probably take it back and see whether there's anything we can say to input into those policies, but I'd highly doubt that we would be able to – again, those need to be developed by the



GNSO and ccNSO, and the charter of this group doesn't allow us
to do that.

MATS DUFBERG:

So, charging is out of the scope of this working group, so...

UNIDENTIFIED MALE: It depends.

[Laughter.]

KUO-WEI WU:Well, I could at least...I just need to bring the issue to the GNSO<br/>to discuss because, in reality, right now, these days. Some of the<br/>ccTLD have a variance. They have a different way of the<br/>charging. Some of them just charge one; but some of them<br/>charge two. So, that's reality this day. So, don't think about this.<br/>Have consistent way to doing the charging in the variants. So,<br/>that is the last word I'm going to [say.]

MATS DUFBERG: Okay, but I mean, GNSO is probably the right group to discuss charging of variants.

Actually, yes?



# EN

- SATISH BABOO: Hi. I'm Satish from At-Large. I have a question on a point mentioned earlier about the fact that the registry has a choice of whether to block a variant or to give it to the same registrant. This question, this choice, I'd like to know if the group, if we have something about say about this choice because it may impact the consumer choice to some extent. Especially if they're looking up natural kinds of variants. So, do we limit completely to the individual registry to create policy on this or do we have to say something on this?
- MATS DUFBERG: Well, I mean the concept of variants is that these two labels are created by different code points but they are actually the same. That's the concept of variants. Maybe they look very alike. I mean they kind of mean the same thing. Just variants of each other. And there's a risk of confusion between the two labels and that is the main reason why they should be handled by the same entity.

So, the risk of confusion will otherwise mean that you're trying to go to one and you go to the other because you miswrite it. So, that's the idea of behind this recommendation.



- SATISH BABU: I completely agree, but my question is specific to the particular policy whether it permits the same registrant to register all the different variants or the registry blocks it. So, whether this choice is completely left to each registry to decide on their own.
- MATS DUFBERG: Okay. Yes, as far as these guidelines, it's left to the registry. But I know that the registry agreement between ICANN and [RO] sometimes the registry agreement states that variants must be blocked, period. So, there's no opening for activation of variants. In other cases, it says that it must be blocked by default and it may be activated on registrant request.

Actually, I've never seen any registry agreement which permits automatic activation, which we say are okay in some cases. But, I've never seen any registry agreement that permits that.

So actually, this is going back to the agreement between ICANN and the RO.

Yes, please. State your name.

[DMITRY BAREVSKY]: [Dmitry Barevsky] from Russia. I have a question – not about variants.



MATS DUFBERG:	Okay.
[DMITRY BAREVSKY]:	Sorry.
MATS DUFBERG:	You're welcome.
[DMITRY BAREVSKY]:	Could you turn back to point four of the transition stage? Yeah. Thank you very much. I think we need to clarify this point. If it's taken from RFC, we should add the link to the corresponding RFC or provide some examples. Thank you.
MATS DUFBERG:	It's a good suggestion that we point back to the RFC, yes. I don't remember if we have that in the document. Obviously not. No. Okay. So, that's a good point.
[DMITRY BAREVSKY]:	When I read the document, I could hardly understand this point, so I think it needs clarification. Sorry. Thank you.



MATS DUFBERG:	Yeah. That's a very good point. Thank you very much. And if you have possibility of sending an email, we will be very grateful.
[DMITRY BAREVSKY]:	Sure.
MATS DUFBERG:	Are there any questions from the queue? Anyone in the back that wants? You're invited to step forward to the microphones. Yes.
EDMON CHUNG:	Edmon here. So, since there are no further discussion, I was wondering in our last meeting, public meeting, there were a couple of comments talking about for us to look into the registration data and the registration provisioning protocol – so EPP and WHOIS, basically – and seeing if there is anything that this needs to talk about.
	We had some discussion around it and felt that it should be – it's probably beyond our scope and if there's anything to do with it, it should happen at IETF or at the policy level in that case. I'm just curious whether anyone have any further thoughts because this was brought to us at the meeting like this.
	I see nobody there, but I will fill up some time here. One of the main questions is especially, I think, in variants – whether there



are anything that we need to say about what is shown and for variants in WHOIS (or RDS as it is now more commonly known), and whether we need to talk about anything on provisioning of these variants again.

That's something we feel that we don't need to weigh in. If anyone feels otherwise, this is time to bring it up and we need to discuss through how registries should deal with these items.

MATS DUFBERG: Yes, please.

ANDREW SULLIVAN: Since there is a PDP going on about the RDS right now, if you really want anything about variants to go into the RDS, I would strongly suggest that you send that to the PDP so that you don't end up in some deadlocked condition with a PDP. This document could be held up forever in that case.

MATS DUFBERG: Yes, please.

ALAN TAN: Yeah. Alan Tan here, again. I just have a question about recommendation nine, I think.



Yeah. It says if registry operators seeking to implement IDN tables that pose any security or stability issues must not be authorized. So, it means any IDN tables that is going to be authorized by ICANN. Right?

#### MATS DUFBERG: No.

ALAN TAN: If not so, how could we evaluate that the IDN table has posed any security issues? I just want to clarify so if there's any preexisting checkup or something – review mechanism for IDN tables to be published or adopted by ROs.

MATS DUFBERG: Yes, please, Sarmad.

SARMAD HUSSAIN: So at this time, IDN tables, which are offered by the new gTLDs, for example, go through predelegation. They're evaluated through the predelegation testing process for security and stability. And if there is a new IDN table which is added after the delegation of the TLD, it is done through the RSSAC process, which also looks at the IDN tables.



And at both these times, the security and stability issues are looked at, so there is already a process which exists which takes the IDN tables [through that check]. Thank you.

MATS DUFBERG: That's correct. For gTLDs, there is such a process to verify the IDN tables. For ccTLDs, there are not. So, there's no process for the ccTLDs that check this, so I don't know if we should clarify this language.

Yes, Edmon?

EDMON CHUNG: Edmon here. I think it's a good point raised. I'm still inclined to the, I guess, the "must" language and part of the language here, even for the ccTLD side because I think the security and stability part is included in the relevant RFCs for ccTLDs, as well – just not specific to IDNs.

> But I think for this working group coming out, to either we take this completely away, or if we are saying anything about it, then if it threatens the security and stability of the Internet, then of course, it must not be there.

> So, I think yes, we may need to think about clarifying the wording. But if we're going to weigh in on this, I'm still inclined towards the "must" part because we are talking about security and stability.



MATS DUFBERG: Yeah, but there is no one authorized saying ccTLD to use or not use a certain code point or table.

Sarmad, please.

SARMAD HUSSAIN: Right. So, as these guidelines stand, they're not requirement for ccTLDs in any case, I think – all of them. They're just recommendations for them to consider.

MATS DUFBERG: Yes, please.

KUO-WEI WU: I think there is another one at this moment. I think when we're talking about IDN variants, it's one small part that's kind of missing. If dispute happens, do we have the dispute resolution into this process such as, for example, I have a TLD and a variant is passing, is agreed upon, and then is open. And now I'm the TLD and I try to apply.

> For example, Indian have many different kind of languages. They claim this is a part of variance. And then I might be a registered TLD in this language and to that language but, unfortunately, they have two different companies. Based on the language, it's a



different company. Do we have this kind of dispute resolution in the PDP process or do we just say, "Okay, go ahead. [We] pass, so you are TLD operator. You can register as many different languages as you want and claim there is a variance"?

- MATS DUFBERG: Dispute resolution is a generic thing not limited to IDN, so I assume that the dispute resolution that applies for traditional domain names also applies for IDN domain names. So, there shouldn't be any special IDN dispute resolution. Or do I misunderstand you?
- KUO-WEIWU: [I don't think] so because right now... Let's assume the IDN variants we are talking today is agreed in this meeting. From this meeting after, I'm the TLD registry. Based on the variants in our current process, I claim the following of this [inaudible] languages of Indians, I claim this is a variance and then I say this is owned by my TLD operator.

But in the different written form, I have a different company – the same thing, but it's two different companies. Can he claim [mine]? We don't have that. It's not us that registrations I'm talking about in the TLD label. I'm not talking about registrant in the final registration.



We do have a [inaudible] that dispute resolution UDRP, I agree. But [inaudible] in the point, in the last point of the name registration, we are not talking about TLD yet.

- MATS DUFBERG: But UDRP will cover, also, IDN names, right? Or are we talking about the TLD?
- KUO-WEI WU: TLD.
- MATS DUFBERG: Okay, so TLD again. Okay. Well, for the last round of new gTLDs, there was a long process of handling conflicts. And, yes –
- KUO-WEIWU: But remember, in the new gTLD in the last process the guidebooks say you can choose one and block the others: the variants. Okay. So, I apply based on the – for example, IBM written in Indian language. I choose one and apply the new gTLD as a registry. Now you pass the variants. I'm going to tell you here Indians have a different many way to script. I claim this part of the variants, then I [register] another one. But very possible



this IBM maybe not a good example because it's a worldwide trademark.

MATS DUFBERG: But this is something for the next round, which, as far as I know, is quite far ahead. I mean, we need something like the Applicant Guidebook, again – or the Revised Applicant Guidebook. That is, I guess, a work for them to consider. A good point to send in to their work when they start.

EDMON CHUNG: Edmon here. I want to respond to that. First of all, this IDN implementation guidelines is much more "implementation" and not so "policy." So, this is not a PDP and this is not a policy development process. It doesn't create policies.

> What you mentioned in terms of those situations was discussed, actually, in the last round and it is included in the GNSO policy recommendations. And the policy recommendations on that specific issue says that just because you have a TLD in a particular language, you don't automatically have the rights to other languages. And that's part of the GNSO policy recommendation.

> In the new round, in the subsequent round, I think that will need to be brought up – yeah – brought up and discussed further



whether there are any changes or that continues. But again, back to here, probably is not within what we need to further discuss for this particular working group. But those are important issues.

MATS DUFBERG: Important issues, but not within the scope of this working group. Sarmad, I think that you raised your hand before.

SARMAD HUSSAIN: I just wanted to point that Edmon wanted to get into the queue.

EDMON CHUNG: Edmon here again. I wanted to moderate slightly what Sarmad earlier said about the application of the IDN implementation guidelines for ccTLDs. It is correct that for ASCII ccTLDs, this is not part of what they commit to. But for the IDN ccTLDs in the fast track process as well as in the PDP, it is specifically stated that the IDN implementation guidelines should be abide by.

> So, in the process of applying for an IDN ccTLD in the fast track process, if I recall correctly, you have to check to say that you will abide by the IDN implementation guidelines. So, this does cover part of the ccTLDs, not all of the ccTLDs.



MATS DUFBERG: But again, there's no predelegation testing or equivalent for them and so they...

In recommendation nine, I think that the last sentence there needs rewording because it's too gTLD-centric and it should apply also for ccTLDs even if it's a recommendation. So, we need to rework that.

We still have time for comments. Edmon?

EDMON CHUNG: Edmon here. Let me tease out a little bit what was asked. Are you concerned that this is a requirement or are you just saying that the wording is confusing? Because I'm not sure, Yaling. Did we answer your question in terms of clarifying the language, or is it the substance that you want to bring up – like, you don't think they should need to be authorized. I guess that's my question.

ALAN TAN: Yes. Actually, there's two thoughts meeting right here. The first one needs a [second] clarification. Of course, I just step in in the middle of the presentation. I don't know what has been prescribed before that; how the IDN tables is going to be implemented or authorized. So, that just needs first clarification.



A second point is that about the IDN table implemented, especially on the second level. I think it's kind of pretty straight forward for any ROs to implement that without the vetting by ICANN. I think my intention that, "Yeah, we don't need any authorization, especially for the second level IDN tables because it's currently what we are doing right now.

MATS DUFBERG: Well, I can tell you that the predelegation testing has shown that many registries have not been that qualified to handle IDN, so to say. They don't fully know what it is about.

EDMON CHUNG: Edmon jumping in. Allow me to respond. This is not... Number nine, a key point about number nine is if you modify existing tables...

> So, if you just adopt CDNC tables and if you adopt existing tables to have them vetted, that is not – that is fine. So, I think that's a key aspect of this. So I just want to make sure that we clarify, and that's why we want to point this out is if you modify existing ones, then something, some process should be done to evaluate and security and stability impact.



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MATS DUFBERG:	But I'm not sure that we should have that language here because that authorization is outside of the guidelines.
KUO-WEI WU:	Actually, I think, Edmon, you're talking about based on current ccTLD, the variants, the table is a clip by themselves.
MATS DUFBERG:	[inaudible.] TLDs.
KUO-WEI WU:	But we are talking about when they're the gTLD, there will be He's asking; he's right. We need to discuss who have a right to keep these tables, to implement this tables. It's [the buyer], gTLD operator, or somebody else.
MATS DUFBERG:	But today, I mean the gTLDs are under contract with ICANN and it's not the same ICANN as our working group. It's a different ICANN. It's an ICANN Board and ICANN staff. I mean, this is an ICANN working group. This contract gives ICANN the right to say something about the IDN tables. And all the gTLDs have gone through predelegation testing.



In predelegation testing, the IDN tables have been reviewed and tested, inspected, and in many cases, the registries have corrected their IDN tables because they have not implemented correct contextual rules or mixed in things that shouldn't be there, etc.

And then in the next phase, they might want to add tables and then there is a process at ICANN to approve the addition of new tables. And this is what this text is about, but I'm not sure that the text should be here in the guidelines because the guidelines should be more generic, I think. Yes – and one could think that the registries should decide by their own, but that discussion is a different discussion.

ALAN TAN: Yes. Actually, following up on your thoughts about IDN tables. I mean, is it recommendable that for the IDN Implementation Guideline to [publish] some of the models or templates – IDN tables – for ROs [to adopt]?

MATS DUFBERG: Well, ICANN is working on these reference tables. They're almost completed. When will they be published, Sarmad? They are published, yes. Okay. So, they are there already. So, there are reference tables to pick from, and if you pick from those, you



know that these are tables that have been reviewed and created by experts in language and linguistics and IDN experts.

Yes, Sarmad.

- SARMAD HUSSAIN: So, there are also examples of IDN tables, which are published at IANA, as well. So, there are multiple guidelines, which are available for registries to use when they're developing their own IDN tables.
- MATS DUFBERG: Right, but the IANA tables are not always authorized or approved by anyone because the predelegation testing, they were just published by anyone, any registry, so it doesn't mean that those are good examples just because they are published by IANA.

And often, they lack contextual rules that are needed to understand the tables correctly – so incomplete.

Okay. I think that we are done.

Okay. One more question there.

SATISH BABU: Sorry. One last [intervention] just because we have time.





MATS DUFBERG: Yes, we do have time. SATISH BABU: I published this public comments request on the At-Large list and there was a request, which I'm not sure will be able to fulfill - whether the proposed document can be provided in an ASCII RFC-compatible format. I'm just posing it because the feedback came up. Please. MATS DUFBERG: ANDREW SULLIVAN: Given that the RFC editor itself is abandoning the ASCII-only format, I don't think there's any big hurry to reproduce that format here. SATISH BABU: Thank you. MATS DUFBERG: Okay. Thank you very much for attending this session and please read the draft guidelines and please provide feedback, large and small, to the working group so that we can create as good guidelines as possible.



SARMAD HUSSAIN: Thank you. So, we're closing the session. Thank you very much for attending. Bye-bye.

[END OF TRANSCRIPTION]

