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ICANN72 | Virtual Annual General Meeting - GNSO EPDP on Internationalized Domain Names
Tuesday, October 26, 2021 – 16:30 to 17:30 PDT

STEVE CHAN: Hello, and welcome to the GNSO's Internationalized Domain Names Expedited Policy Development Process. My name is Steve Chan, and I'm the remote participation manager for this session. Please note that this session is being recorded and follows the ICANN expected standards of behavior.

During this session, questions or comments submitted in chat will only be read aloud if put in the proper form. I will put the instructions in the chat. I will read questions and comments aloud during the set time of the chair of this session. If you'd like to ask your questions or make your comments verbally, please raise your hand. When called upon, kindly unmute your microphone and take the floor. Please state your name for the record and speak clearly and at a reasonable pace and mute your microphone when you're done speaking.

With that, I will hand the floor over to the Chair of the EPDP, Donna Austin. Thanks.

DONNA AUSTIN: Thanks very much, Steve. And welcome to this IDN EPDP meeting. This is essentially a working group session, so we're not going to provide any information about the background or the history of why we're here. But Ariel is going to put some links in the chat that can help folks that are just tuning in today for this session.

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.

For today's agenda, in addition to the GNSO's IDN EPDP, the ccNSO have also a IDN PDP that they've been working on in parallel to us. Actually, they're a little bit further ahead than we are. And one of the Board has asked in the resolution that kicked off these meetings that the cc and the GNSO PDP keep one another informed of what's happening and where we're at.

So what we're going to start this call off with today is an update from the ccPDP, and that will be done Kenny Huang from .tw. And he's the Chair of the ccIDN-PDP, and he will be joined Anil Jain from .in (India). And he is the Vice-Chair of the group. And Anil is also the alternate liaison to the GNSO IDN EPDP. So we have liaisons across the different two groups. And I believe Dennis Tan is the liaison that works the other way, if I've got that correct.

So with that, I think I'll hand over to Kenny and Anil.

KENNY HUANG: Okay. Thank you. Can you hear me?

DONNA AUSTIN: Yes, we can.

KENNY HUANG: Okay. Thank you. Thank you, everyone. My name is Kenny Huang, Chair of the ccPDP4, together will the Vice-Chair, Anil Kumar. He is also a liaison to the IDN ccPDP work group. It's my honor to give an update regarding IDN ccPDP4's progress.

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Next slide, please. So initially we need to identify what will be the purpose for IDN ccPDP4. So the purpose for IDN ccPDP4 is to try to develop a ccNSO policy and take into account experience we had from the IDN ccTLD fast-track process. As you probably know, initially we had a fast-track process to launch our IDN. So once complete, that would replace the fast-track process. So the policy for IDN ccPDP4 will address the potential open issue, especially related to validation and delegation of variants of IDN ccTLDs. Also we defined the events that triggered the process of retirement of IDN ccTLDs.

Next slide, please. The overall structure for IDN ccPDP4. We have a full working group. I come to you as Chair of the working group. The full working group updated a basic document that was from 2013, which has already been complete. And we also kept updating the basic policy document with subgroup recommendations.

So we cover three subgroups. The three subgroup will variant management, and that's including a focus on defining variants of IDN ccTLDs and the requirement from the delegation of variant IDN ccTLDs. And some are tasked also with coordinating with GNSO IDN EPDP. That's why we're giving the update today here. And also from the IDN ccPDP4 perspective, it's to coordinate using the results from SubPro on the basic document, coordination at the leadership level, and partially joint membership and partially joint staff support.

Our second subgroup is the selection of IDN ccTLDs. Anil is also the Chair of the second subgroup. And we just launched the subgroup. We

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had the first meeting for the subgroup. So later Anil will give some update on the subgroup.

The third subgroup would be on confusing similarity. We haven't officially started the subgroup yet. It will also update the basic process and will also take into account experience of the IDN ccPDP and IDN ccTLDs especially for the fast-track process.

Next slide, please. So progress up to date for the working group. A basic recommendation has been adopted by the full working group, including that IDN ccTLDs have to be a meaningful representation of the name of a territory in the designated language of the territory in a script in which the designated language is expressed. Also, we have a definition of the territory. And also the IDN ccTLD string has to contain a list of one non-ASCII character. Support a selected string significantly interested parties, included but not limited to relevant government of a territory. Also required documentation and also process steps.

Okay, on the next slide I need to move the mic to my Vice-Chair, Anil. Next slide, please. Anil, your turn.

ANIL JAIN: Good morning, good afternoon, good evening, depending on the time. Thank you very much, Kenny. As Kenny has informed, two subgroups are working in parallel to this IDN ccPDP Working Group 4. One is on the Variant Management Subgroup, which we started somewhere around six months back. And the second subgroup on the deselection has just started.

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So the first Variant Subgroup has started working and we have progressed a lot. We were addressing the question of the staff paper and also the Technical Study Group. That is what is required. So initially we discussed about the definition of the variant and also the difference between the variants and the similarity. We have completed the work for discussing the staff paper and agreed to use the root zone LGR for validation and identifying the variant ccTLDs.

We did a comparison of the staff-proposed recommendations—that is, SubPro recommendations. We are also discussing in detail distinguishing between the policy recommendation and advice to ccTLD managers. Here we discussed about the definition of the same entity which has got the delegation of ccTLD or IDN ccTLD. Also the variant of those IDN ccTLDs should be given to the same entity.

Now, here the group has also discussed about the second-level domain, whether the same entity should also be discussed for the second-level domain as it has been done for the top-level domain. So the Variant Subgroup recommendations strongly recommend only to assign all variants of a specific SLD to the same entity. We have completed this, and now we are at the discussion level of the Technical Study Group.

Next to discuss in the Variant Subgroup is the IDN tables and the requirement of the IDN tables under IDN ccTLD policy. We are also going to discuss about the IDN Guidelines, Version 4, whether they are going to have any impact on the IDN ccTLD managers and ICANN. And then we'll also update the basic process document. So this is all what we have done in the Variant Management Subgroup.

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Next slide, please. The next subgroup which we created and started working is the Deselection IDN ccTLD. The goal of the subgroup is to define the trigger event. That is the event that would cause the retirement process to start. To start this, we discussed about [the] retirement recommendations have come from ccTLD Working Group 3, and we also took the presentation from Jaap on ISO 3166, [then] a meaningful discussion on deselection can start.

So the first thing we discussed in the subgroup is that the subgroup identified the potential events based on the basic requirements for IDN ccTLDs. For example, if the name of the country is removed from ISO 3166—for example, Yugoslavia—then automatically the IDN ccTLD strings and their variants should be removed. Another example is change of script, which is already defined for when an IDN is changed from—a designated language is changed. So these are certain examples on this. We will discuss and advise the full working group which event should trigger the retirement process. Thank you.

Next. The next steps is the conclusion of the Variant Subgroup, which we are scheduling for the end of 2021 or early 2022. We are also aiming to conclude the Deselection Subgroup discussions, again ending in December 2021 or early 2022. And then we'll update the basic policy with the Variant Management and Deselection Subgroup with the main group. We'll start the Confusing Similarity Subgroup in the early part of 2022, and the first meeting of that subgroup is expected by early 2022. Then, once we update all the three subgroups in the main full working group, we'll conduct stress testing with the community somewhere in Quarter 2 of 2022.

So this is all from my side about the subgroup update to the community. Back to Kenny. Thank you.

KENNY HUANG:

Okay. Thank you, Anil. So please move to the next page. So that would be the complete schedule for ccPDP4 Work Group. You can see details for how we progress and what would be the expected timeline according to what we're going to deliver in the near future. So basically you can see we have already formed the Variant Management Subgroup and expected to deliver a final recommendation at the very beginning of next year. And we also have just formed the Deselection Subgroup, as Anil presented. We just formed the subgroup and running the first meeting. And it expects to be done and propose a final recommendation to the full working group also at the beginning of next year. And we're going to form the Confusing Similarity Subgroup probably by the end of this year. And they will give a final recommendation to the full working group by the second quarter of next year. And we plan to propose an initial report, and the initial report will be in the third quarter in the year 2022. And, also, we plan to deliver the final report. That would be given by the third quarter of next year.

That's our proposed agenda for the ccPDP4 Working Group. We are happy to take any questions. That's the end of our presentation. Thank you.

DONN AUSTIN: Thanks very much, Kenny and Anil. I think probably, from our perspective, we should have some conversation around, I guess, whether ccs end up on variant management. And I think Jeff has put in chat that "confusingly similar" is probably another area that we'll be looking at some point as well. So I think, as we work through our work, we should ensure that we have more regular touchpoints and we understand what our respective work recommendations we're coming up with are. So I would encourage our respective liaisons, if they could, to coordinate a little bit on that so we could have touchpoints as we need to.

Any question from our anybody?

So I see we have a question from Satish, which is, "What are the points where coordination between the ccNSO PDP 4.0 and EPDP on IDNs will take place?" I think, Satish, that's what I'm talking about. That's something that we will have to work out between the respective groups and ensure that we do have that coordination because it was requested by the Board in their resolution on IDNs. So more to come on that one.

KENNY HUANG: Yeah. Thank you. I think that's very important, especially coordination among the variant management. And [we'll] probably also cover the confusing similarity as well because that's a very technical focus. And, actually, that should be a common area that both the ccNSO and GNSO should work together on.

DONNA AUSTIN: Okay. Thanks, Kenny. Edmon, go ahead, please.

EDMON CHUNG: Thank you, Donna. And thank you, Kenny and Anil, for the presentation and the update. I think this is timely and very useful for this group as well.

So a couple of things. In the progress chart, there is a part about IDN tables. I was wondering if that is related to the IDN guidelines that you mentioned.

And I guess the main question is on the IDN guidelines because I'm noting that the 4.0 that you're looking at is not fully adopted by the Board yet. I was wondering if there were further thoughts on that.

But before you go to that, I wanted to quickly respond to Jeff's point in the chat as well. I think coordination is good, and keeping tabs is good, but there are going to be, down the road, potentially quite different ways of addressing it in terms of confusingly similar. If you look back at the case of … I forgot what it was, but I think it was Bulgaria that looked very much like br. And the handling there might be very different than the situation with what we want for the gTLDs. So we might have some divergence in how to handle the exceptions as well.

But just a clarification question on the IDN implementation guidelines.

KENNY HUANG: Okay. Thank you. I'll just quickly, and probably Anil has something more. Initially, we had already formed a Variant Management Group.

They're working on the similar issue because we need to, based on that kind of issue, probably I might mention IDN guidelines, [which] is now adopted by the ICANN Board. But I believe that issue has been raised, so we put it in the schedule. And the subgroup on variant management haven't proposed their final recommendation. It's going to propose its final recommendation at the beginning of next year. And probably Anil can give a basic update for the subgroup on variant management.

ANIL JAIN: Yeah. Thank you, Kenny. I agree with you to some extent that there may be some differences in the GNSO recommendations through IDN PDP and the ccNSO through ccPDP Working Group 4 because there may be some issues. But the purpose of this coordination is that whatever the outcome and discussion will be there in this working group, we will be updating IDN EPDP on a regular basis so that, when they are discussing and deciding on the recommendations to the GNSO, they can keep those recommendations intact.

Now, when we are talking about the IDN Version 4 recommendations, which are yet to be adopted by the Board, the purpose of this is to understand whether the changes which have happened over the years have an impact on the recommendation of Working Group 4 and whether those differences have to be adopted in this particular subgroup on variant management.

And I fully agree with Kenny that, also, whenever the Confusing Similarity Subgroup works, those recommendations and those

discussions will also be [given] to the IDN PDP by the liaison. Thank you. Thank you, Kenny.

KENNY HUANG: Thank you, Kenny.

DONNA AUSTIN: Did you have a follow-up, Edmon?

EDMON CHUNG: Yeah. Thank you, Donna. Just a quick follow-up. The reason why I brought up the IDN implementation guidelines is also that, in part of the charter for the GNSO side, I wanted to alert you guys that we are going to be looking at the process for the updating of the IDN implementation guidelines as well. Since the guidelines actually implicate both cc's and g's, I'm not looking for an answer immediately from your side, but perhaps at some point you might want to take a look at the update process for the IDN implementation guidelines and also see if the ccNSO has anything they would like to weigh in on or change in the process as well.

KENNY HUANG: Okay. Thank you.

DONNA AUSTIN: Thanks, Edmon. So I'll go to Dennis and then Jeff, I think.

DENNIS TAN: Thank you, Donna. I just have a response to Edmon's question regarding the IDN table in the context of the variant management in ccPDP4. Basically two things here. In the context of ccTLDs and IDN ccTLDs, in the past fast-track or otherwise process, the applicant, the ccTLD operator, was required to present the IDN table that was used for the string that was use for validation. That IDN table for the ccTLD string now would be replaced by the root zone LGR. That would be the one and only IDN table used to validate and calculate variants for top-level domain names. So that's on one level.

The other question on the table is whether ccTLD operators would be required to publish the IDN tables for second-level registrations. That's something that I don't think is required at the present moment for all ccTLDs operators. That's kind of the question in that regard. And the Variant Management Working Group is still weighing in on the pros and cons on whether to issue a recommendation or guidance for that matter. So it's two levels, one at the top level and the other one at the second.

KENNY HUANG: Thank you, Dennis, for the clarification. Thank you.

DONNA AUSTIN: Thanks, Dennis. Jeff?

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JEFF NEUMAN:	Two things. The first one that—I'm not sure if it got forwarded to the group yet—the GNSO had asked for kind of a moratorium for considering the IDN timelines due to the fact that the GNSO wanted to finish this policy process first before it got to work on the IDN guidelines. The Board, however, sent a letter back to the GNSO Council—it was probably just a couple of days ago—where the Board has made a statement that there could be some security issues. I'm not phrasing it exactly the way they did, but they wanted the GNSO Council to bifurcate the IDN guidelines to tell them which guidelines we could proceed on without having to rely on this policy group and which ones would require reliance on this policy group. The GNSO Council is going to have to come up with a response to that. My guess is, I would think, that they might ask our view on it. But I just wanted to point that out as one new development.

The second thing is the confusing similarity part. The reason I was bringing it up and why coordination is so important is that, in both cases, when ICANN does the review or their evaluator does the review for confusing similarity for the ccTLDs, it doesn't just look at whether it's confusingly similar to another ccTLD. It looks at whether it's confusingly similar to any TLD, which includes gTLDs. And, similarly, in the new gTLD process, when ICANN does a review of a new gTLD application, they look at confusingly similar with respect to not just the other applications and existing gTLDs, but they also look at whether it's confusingly similar to a ccTLD. So for those reasons, it's not necessarily the process and the appeals—that could be very different—but the

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standard by which confusing similarity is measured. I would think it's in the best interest of all of us to have that be the same.

That was my point. Thanks.

KENNY HUANG: Thank you, Jeffrey.

DONNA AUSTIN: Thanks, Jeff. In terms of the letter that Jeff is referring to, I understand the letter was written to the council from the Board. As far as I know, the council hasn't considered that yet. But there is half an expectation that it will come to us at some point for consideration to see whether we have any perspective on it. But I think, to a large part, that interaction on the guidelines has been between the Registry Stakeholder Group and through the council to the Board. So we're not sure where that's going to come back to yet and whether there will be an action item for us, but just to flag it at this point—that it is … We had expected that the guidelines would be perhaps part of our work, but it looks like the Board is potentially asking us to expedite that part of the work, which I don't think we had planned for. So will let you know when we hear from the councilors as to whether there's an action items for us, just to ensure that you keep informed on the guidelines item.

And on the confusingly similar point, I think Jeff's point is consistent on why the Board has asked us to coordinate to ensure that there is consistency where we can make that happen, given the unique considerations that are associated with IDNs in the DNS. So, moving

forward, we will ensure that we have that coordination so that we are able to share information about our various discussions.

So we—

KENNY HUANG: Okay. I think that coordination is very critical and [inaudible] technical grounds, so we need to make sure all the technical consistency, all the— for something like variant management or confusing similarity … Those kinds of issues should be covered. Thank you.

DONNA AUSTIN: Thanks very much, Kenny. And thanks, Anil. I don't think we have any more questions for you. So with that, we might kick over to our working group meeting. But thank you very much for attending. And we'll ensure that, moving forward, we have more opportunities to have conversations with you.

KENNY HUANG: Thank you. And thank you for your invitation. Bye-bye.

DONNA AUSTIN: Okay, team. So for the GNSO IDN EPDP, we're going to continue our discussions on Question A3. So Ariel, if we've got the next slide … Okay. So the Charter Question A3 is largely the second paragraph here. "If an applied-for TLD label whose script is supported by the root zone LRG is

determined to be invalid, is there a reason not to use the evaluation challenge processes recommended by SubPro?"

So, as the team knows, we've had a number of discussions around this topic. And as a result of our last conversation, where Steve took us through some of the challenge processes that are identified in the Subsequent Procedures work and possible considerations for those challenges, what the leadership team and staff have done in the last week is … because it was becoming a little bit confusing about what processes we were potentially about. So we thought what might be helpful is if we have a look at potentially what the process would be for an IDN applicant in a new gTLD process and see if we can identify where there could be opportunities for a challenge process associated with the determination that the label was invalid because it wasn't supported by the root zone LRG.

Next slide, please, Ariel. So we've made a few assumptions with this. So if you can bear with us on this, there was an assumption when the charter was developed that the Board would approve the SubPro recommendations and the implementation guidance adopted by the GNSO. So we're just going to hold with that assumption, even though it hasn't happened yet: that the label requirements will be updated to incorporate the root zone LGR validation requirement, that the label requirements will be built into the application system, and that the initial algorithmic check will be implemented.

So this one is kind of important because there's an assumption here that the application system will actually do a check of an IDN label as it

is submitted to the system. So this is an important consideration. And it's also consistent with SubPro Implementation Guidance 2610, which pretty much provides the same sort of guidance [that] will be available in the application system.

The DNS Stability panel will be in a position to be able to check that the root zone LGR has been applied correctly. And also an assumption … Because this came up during our last conversation about level of knowledge of applicants … And we want to start this conversation … We want to come from an assumption that the applicants are well-informed about the root zone LGR and how it works. And I think, based on the assumption that, at the time you submit an application, the label wouldn't pass the string test, I think that's a reasonable assumption for us to make.

So what we've got in front of us a really brief outline of what potentially the process could have been in 2012 had there been a root zone LGR available. So most of you might be aware that the root zone LGR has only been developed since 2012. So it wasn't available at the time of the new gTLD application process in 2012.

So that's kind of the assumptions. And what we found interesting when we had this discussion among the leadership team and in putting this process together is that there's a fundamental assumption at the beginning of the application process that, if you don't pass that algorithmic check in the initial application system, then you don't proceed any further in the process. And I think that's a really important discussion that we probably need to hash out here: "What does that

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mean in terms of what we're doing here?" and whether members of this working group come to the same conclusion.

So Jeff has a question here. "How can we make the assumption that the label requirements will be built into the application system?"

So, Jeff, I think we can make that assumption based on SubPro implementation guidance, which basically recommends that it is built into the application system. So I think that's a reasonable assumption for us to move forward with. But if we want to have an argument about it, we can … Sorry. I should say, if we want to have a discussion about that, I think we can do that. I understand the guidance is not a binding recommendation, but I think, for the purposes of this conversation— you'll see in the next slide that Ariel is going to take us through—we kind of address that base-level assumption: what happens if it's not correct?

So I agree that we should kind of have a Plan B if that assumption doesn't hold, but we want to kind of level-set here. We're only talking about the applied-for gTLD label. We're not talking about variants at this point, just to try to make the conversation a little bit easier and see whether our thought processes hold with the group here. And then, how does that help us in answering the question that we have before us?

So what we're assuming with #5 is here is that all applicants, if they're considering submitting an IDN application, understand that it will need to conform with the root zone LGR. So I think that's baseline of that assumption.

Jeff, go ahead.

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JEFF NEUMAN: Thanks, Donna. And I agree with that: that they should understand that it has to conform with the root zone LGR. I don't think the wording here is. I was worried about the wording here. I'm not sure they'll understand the background and the utility of it, but they should understand that it needs to conform. So I would rephrase this fifth assumption. It may not be important for what you have on the next slide (because I haven't seen it yet), but just in case it is important, I would only assume they know the rules and that they have to conform. But they shouldn't assume they know why.

DONNA AUSTIN: Okay. Fair point, Jeff. And we can certainly note that.

Okay. Any other questions at this point?

Okay. So let's go to the next slide, Ariel. Ariel is going to take us through this, but if we can just keep an open mind, we understand that there's no way we can predict what the process flow for the application will be in a next round because that hasn't been decided yet. But this is our best guess of how we think the process will go. And we hope that that will help inform our discussion to ultimately assist with the charter question.

So, Ariel, with that, I will hand it over to you. Thank you.

ARIEL LIANG: Thanks very much, Donna. This is Ariel Liang from ICANN Org In collaboration with the leadership team who developed this simplified flowchart to provide a rough sketch of how the process flow might look like. So the caveat that Donna noted is very important. And then I will start the process.

So the first step is for an applicant to attempt to submit a gTLD label into the application submission system. And the system has this initial algorithmic check on whether it's valid based on the RZLGR. So that's one of the assumptions in the previous slide that Donna mentioned. So that's the first time that RZLGR is being applied here. And this could result in one of the outcomes. So this is basically saying the submitted label is valid according to RZLGR.

Then this label will go forward to the next step of the process. So if you recall, in the 2012 round there was this administrative completeness check. So we assume it would pass that, just to simplify this process. And then it will go to the initial evaluation based on our understanding [that] the DNS Stability Panel should first check whether this RZLGR is correctly applied. So that's the second time RZLGR is in the play for this process. And this could result in the DNS Stability Panel confirming that RZLGR is correctly applied and the label is valid. Then this application will proceed to the next stages of the processing.

So that's the first, most smooth path that an application could have that we're looking at.

However, there could be—

DONNA AUSTIN: Ariel, can you just—sorry. We have a hand up. So, Jeff, go ahead.

JEFF NEUMAN: I can wait until she's done. I don't have to ask it at this moment.

DONNA AUSTIN: Okay. All right.

ARIEL LIANG: All right. Thanks, Jeff. Thanks, Donna. So the second path for this process is, if the DNS Stability Panel finds out that the RZLGR is incorrectly applied in the initial algorithmic check and then that label is actually invalid, then the application is rejected and the applicant is informed. So this could be a very unlikely scenario, but we want to account for this. So that's the second possible path this application may have.

The third one is, in the initial check, if it is already found out that the label is invalid according to RZLGR, then the applicant will receive a warning that shows that it's not conforming with RZLGR. It's very likely that your application will be rejected. So the applicant can take this particular option, abandon the application for this specific label and the process stops here, or the applicant can decide to update the label in order to conform with RZLGR and then will go to the starting point of the process.

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And the [fourth] option is the applicant decides to move forward with submission of this application even after receiving this warning message. So it will go through the next step—administrative completeness check—and then initial evaluation. So the DNS Stability Panel would check whether RZLGR is correctly applied here again. And then that's the second time RZLGR is a play of the process. And one of the results is that the DNS Stability Panel confirms that this RZLGR is correctly applied and the label is indeed invalid. Then the application is rejected and the applicant is informed. So that's one path.

But it could result in that the DNS Stability Panel finds out that the RZLGR is actually incorrectly applied in the initial algorithmic checking and the label is actually valid. Then the application will proceed to the next stages of processing.

So now we're looking at the middle part, the red square basically. What happens when the application is rejected and the applicant is informed? So one path the applicant could take is to withdraw the application for that specific label. But then, if the applicant believes that there is grounds for a challenge—basically, the applicant believes that the label is actually valid and the DNS Stability Panel's finding is wrong—then it can initiate a challenge process. So that's where the challenge process would happen.

But for the DNS Stability Panel, it's not really the authority to decide whether the RZLGR calculation is right or wrong or complete or incomplete. So this panel will refer this challenge to the generation panel for that relevant script.

So that's very much a simplified process flow that we kind of envisioned. Indeed, it's not a complete picture of how it looks like, but hopefully this will provide some general understanding or background for the EPDP to deliberate on whether this challenge process is reasonable, whether the [stat] looks like fine. And so that's hopefully helpful for discussion.

And I will stop here. Donna, please take the floor. Thank you.

DONNA AUSTIN: Thanks, Ariel. So I guess what's important to note is we've done this, really, just to illustrate that there's probably only two possibilities for challenge. And one is something that we didn't particularly pick up on with Ariel, and that could be at the time that the application is submitted. So I guess, if we look at that the applicant decides to proceed with submission after warning, that could be considered a challenge, I guess. So they could say, "Well, we don't agree with you and we want to proceed." So that's what's covered here.

So, Jeff, thanks for your patience. I know your hand has been up for a while. So please go ahead.

JEFF NEUMAN: Thanks. I think this may have been answered, but can you go to the assumptions? So what we're assuming is that, when they do the initial check, it'll allow the application to go forward. It's not that … Or is it? … Okay. So in 2012, were you allowed to submit applications that didn't comply with one of the stability rules upfront? Like if you applied for a

TLD that was longer than 63 characters or that had hyphens in the first position, I think that wasn't allowed. Is that the way the 2012 system worked? Or did it allow the applications to go through with a warning like this?

DONNA AUSTIN: Jeff, I don't know the answer to that. I'm not sure whether the [test] system … how that worked and what the steps in the processes were. I don't know if anybody else knows.

Steve, go ahead.

STEVE CHAN: Thanks, Donna. I'm going to try to test my memory from the 2012 round. I think, to the extent that we could build in requirements into this system, we did so. I think the part I don't recall is whether or not it captured every single requirement and could be considered definitive in terms of integrating the string requirements. But I believe the way it was designed was intended not to allow invalid strings to be submitted.

That said, the way that the question is being depicted here is it doesn't necessarily have to be that way if this group determines differently. Thanks.

JEFF NEUMAN: Right. Thanks. So I guess that was point. So we would need to explicitly state that invalid or potentially invalid strings need to be able to go to

that next step. And if that's the case, then I think the rest of it makes a lot of sense.

DONNA AUSTIN: Jeff, can you just say that again, please?

JEFF NEUMAN: Yeah. We would have to be explicit that the applicant system must still take the application even if it finds that the label is invalid for any reason. Right? *phone rings *Oh, sorry guys. It's my daughter calling.

So, in other words, in the last system, it may have been built that, if you had a hyphen at the beginning of the string, the application system wouldn't even accept your application. It wouldn't take the whole thing. And so we would need to be explicit, if we were to adopt this process, which I said makes sense, to say that, if the applicant submits a gTLD application and fails the initial algorithm check, it nonetheless should still be allowed to be submitted and move on through the process. That's all.

DONNA AUSTIN: Thanks, Jeff. So I think that's what we're trying to get at with … Ariel, I think, if you can point to your second pink … Go back to this second pink square. I think that's what we're trying to pick up with here. So if the applicant decides that they want to proceed with the application, even though the label has been determined to be invalid, in my mind that

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could be a potential point for challenge because that's the point at which the label was determined to be invalid.

So you're right. We either have to be explicit that we can allow to decide that they want to proceed and take their chances through the process, or we need to decide that, because of the weight and the importance to stability and security of the DNS of the RZLGR, the applicant isn't in a position to make that decision that the string is determined invalid. They have the option to change the label to conform with the root zone LGR or they can just abandon the application. So that's the decisions I think we have to make.

Jeff?

JEFF NEUMAN: I think that's right, Donna. But I think the only—and I'll put this quotes—challenge is really where the box is, the red rectangle, because the first one, Point #1, is not really a challenge. It's just the applicant making a decision to go forward and take its chances. The only challenge as it was kind of looked at with SubPro would be that red rectangular box.

DONNA AUSTIN: Okay. That's fair. Justine?

JUSTINE CHEW: Thank you, Donna. Two points. One is I think I agree with Jeff that we could look at the first box, the pink box, where it says "1," a prelude to

a challenge rather than an actual challenge. I mean, that's just a suggestion I'm throwing out there.

The second point I wanted to make is we are really looking at this from a perspective of the IDN label requirements. So we're not—well, I, particularly, anyway—looking at it from having to meet the other string requirements.

So, Jeff, you talked about whether something that doesn't meet the string requirements outside of the IDN label requirements would be able to proceed in the application process. Well, I suspect it wouldn't. So we need to be able to distinguish or at least recognize that there are multiple levels of requirements that we're trying to meet. And in this process, we're just looking at the IDN label requirements. Thank you.

DONNA AUSTIN: Thanks, Justine. So I'm really interested to hear … I know that this is the first time folks have seen this, so it may be a little bit difficult to react. And we're six minutes from time. But I'm interested to hear from others as to whether they have thoughts—just quick gut reaction, I suppose—to what we've put in front of you here.

Sarmad?

SARMAD HUSSAIN: Thank you, Donna. So just to follow-up on the comment which Justine just made, there are, I guess, at least two layers of checks here, and I think it may be useful to distinguish between them. One is the checks

which require conformance to the IDNA 2008 standard. And those are that a string which does not conform to the IDNA 2008 standard should not be able to proceed. And I guess we cannot challenge that within the ICANN context because, if somebody wants to change that, they would need to go back to the IETF, which has developed that standard.

And if it conforms to the IDNA 2008 but does not qualify through the root zone LGR, which is another layer on top of IDNA 2008, that is the layer where it can potentially be challenged in a way in which it is suggested that it goes back to the generation panel for that script, which has created that extra layer, and then, I guess, asks the generation panel to review the potential request.

Just wanted to make that distinction. Thank you.

DONNA AUSTIN: Thanks, Sarmad. Steve?

STEVE CHAN: Thanks, Donna. I just wanted to read a comment from the chat. It's labeled as "comment." This comment is from Bill Jouris. "If you're going to use the root zone label generation rules for second-level domain names, you will have to deal with the fact that some symbols which are not allowed in the RZ are okay for SLDs (or Second-Level Domains)—for example, numerals 0 through 9, at least three of which are confusingly similar to letters in the Latin script."

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DONNA AUSTIN: Thanks, Bill, for the comment. And second-level is something that we will get to as we work through our charter. But we're in very early stages of work here.

Okay. So we are three-minutes from time. What I would like to ask our members of the working group to do is have a look at this process flow. See if it makes sense to you. If there are any questions that you might have or clarifications or discussion, can we try to start that on the e-mail list? I know we've only had a small amount of interaction today, but it seems to me that, when we think about this question about whether or not we should adopt challenge or appeal mechanisms similar to what was developed in SubPro, what we're talking about and what was alluded to, I think, in the charter question, in the paragraph before the actual question, is that we're looking at a challenge that would fall out of the DNS Stability Panel. And that's what we would be looking to try to provide some guidance on how that would work. So what would be the criteria and who would be the arbiter? So that goes back to some of those questions that Steve took us through in our last conversation. So that's kind of tying Steve's presentation and this presentation together.

So I hope folks have found this helpful, particularly members of our working group. I would say it took us a good 90 minutes to work through this when we started to discuss it with Edmon and Justine and [Farrell] and Steve and Ariel and Emily as we start to work through this. So it's good to see that it didn't seem to have screaming objectives to it. So we could be on a good path.

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So thanks, everybody. We will, for the working team, pick this up again next Thursday, I believe. And I really do need to have a conversation with out working group about moving to 90-minute calls because 60 minutes just isn't going to get us anywhere. So I look forward to that discussion.

Thanks, everybody, for attending. I think we can end the recording here, Julie.

[END OF TRANSCRIPTION]

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