

## Brief background

Internationalized Domain Names (IDN) are a functionality of the DNS that allows global Internet users to use domain names in their own languages or scripts. Those scripts are derived from different languages such as Arabic, Chinese, Cyrillic, etc. to form internationally recognized characters to use on the Internet.

In order to assist in the development and promotion of multilingual Internet using IDN, ICANN set up a mechanism to establish, review and update the Guidelines for their implementation. IDN is standardized in IETF in IDNA 2008.

The current document, draft version 4.0 of the IDN Guidelines, supersedes the version 3.0, following the expansion of the DNS under the 2012 New gTLD Program. A first draft was released in March 2017 and some comments were submitted by the community. The IDN working group took the comments into account and finalized a second draft of the document, which is now under public comment since October 2017.

## Comments

The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on draft version 4.0 of the IDN Guidelines. The NCSG is the most diverse body in the Generic Names Supporting Organization, with individual and organisational members from 128 countries. As a network of individual and organisational academics, Internet end-users, and civil society actors representing the interests of non-commercial registrants, we represent a broad cross-section of the global Internet community.

Overall, the IDN Guidelines have been updated regularly and in a satisfactory manner since its version 1.0. This version 4.0 of the IDNs Guidelines is a well-written document which has already been published for a [first public comment](#). Following the first round of the public comment, all the comments raised by the community were addressed and the document was published for a second review. However, two issues remain open or unsolved:

1. A [comment suggests](#) that: **"a TLD can't restrict the codepoints of names inside its zone for which it's not authoritative (such as delegations to sibling zones or glue records names), but should check such labels are syntactically valid U-labels (in RFC 7940 sense)".**
2. The Working Group seeks input from the community to propose a timeline to implement Guideline 6(a)

Regarding the first point, the [issue raise by NIC Chile](#) seems legitimate. However, the WG stipulates that this is beyond the scope of this document. Therefore, one may wish to know how ICANN is planning to address this case.

As far as the timeline is concerned, we suggest at least four to six (06) months period in order to align with the ICANN duration for a public comment cycle. It offers a large period to analyze, review and make realistic adjustment before implementation. This duration can be augmented by the technical processing delay required for the implementation.

With regard to terminology, we would like the usage of "should" instead of "encourage" and replace the current occurrences in order to urge related parties(registries and registrars) to take actions for registrants benefits.