

Registries Stakeholder Group Statement



Issue: **Guidelines for Developing Reference Label Generation Rules (LGRs) for the Second Level Version 2**

Date statement submitted: **12 May 2020**

Reference url: <https://www.icann.org/public-comments/lgr-second-level-2-2020-03-30-en>

Background¹

The document describes the process to be followed in developing a set of reference label generation rulesets (LGRs) to be made available for selected languages and scripts on the second level. These reference LGRs are intended to be comprehensive enough that they do not require further additions to be useful. At the same time, they should be relatively conservative. This should enable registries to adopt these LGRs either as is, or to take them as the basis for further modifications.

Registries Stakeholder Group comment:

The Registry Stakeholder Group (RySG) welcomes the further development of reference LGRs for the second level, by ICANN and the community. The combined knowledge about the different scripts of the world as to how they can be properly used in the DNS is a valuable asset for us all.

Internationalized Domain Names (i.e. in Latin and non-Latin scripts) enable competition and choice among Internet users. Therefore, a fine balance needs to be achieved between usability and security concerns. On this note, the RySG appreciates the tremendous work from the different script communities in producing and developing script-based LGRs for the root zone. The root zone is a special zone and rules designed for it should be conservative; however, LGRs for lower levels could relax some of those rules that better meet the needs of its users.

¹ *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*

The RySG values the dissemination of good practices, such as the reference LGRs, but the group notes that ICANN org’s intention is to apply these reference LGRs to “improve transparency and consistency of testing IDN tables”. And although a registry operator, as a contracted party with ICANN, does want consistency and predictability in its operations and obligations, the RySG observes that there is not a contractual basis to require registry operators to adopt said reference LGRs. ICANN org is implying that these reference LGRs could be enforced during RSEP or RST procedures, but the RySG maintains that registry operators have the prerogative to determine the registration policies that best suit our market realities, within applicable law and contractual obligations.

Therefore, the RySG welcomes these good practices and looks forward to working with ICANN and the community to develop a process for adopting the anticipated reference LGRs within the multi-stakeholder, consensus process.

Errata

Page 7, 1st paragraph (typo):

The code point in the line “...augmented with the Hyphen (U+0030)...” should be “U+002D” instead of “U+0030”.

Pages 15 and 16 (broken links):

The following URLs are broken:

- <https://www.icann.org/en/system/files/files/MSR-3-overview-28Mar18-en.pdf>
- https://meta.wikimedia.org/wiki/CIS-A2K/Indic_Languages/Numerals_in_Indic_Languages_%26_Indic_language_Wikipedias
- <https://github.com/dotse/IDN-ref-tables/blob/master/Guidelines%20for%20IDN%20Reference%20Tables.pdf>
- <https://www.icann.org/resources/pages/variant-tlds-2012-05-08-en>
- <https://www.icann.org/en/system/files/files/idn-vip-integrated-issues-final-clean-20feb12-en.pdf>