

Registries Stakeholder Group Statement

Issue: **Recommendations for Managing IDN Variant Top-Level Domains**

Date statement submitted: **17 September 2018**

Reference URL: <https://www.icann.org/public-comments/managing-idn-variant-tlds-2018-07-25-en>

Background¹

The Recommendations for managing IDN variant labels for top level domains have been developed by ICANN org and are being published to seek community feedback for finalizing them.

Registries Stakeholder Group (RySG) comment:

The RySG welcomes the introduction of Internationalized Variant Top-Level Domains or IDN Variant TLDs and appreciates the opportunity to provide input to the Draft Recommendations for Managing IDN Variant Top-Level Domains.

Root Zone, IDN Variant Top-Level Domains and Second-Level IDNs

The root zone is a shared resource that must be managed in a secure and stable manner but should do so by balancing the needs and expectations of end-users and the internet community at-large. To that end and with respect to the matter of the IDN Variant TLD Framework, the RySG finds consensus around the following principles:

- The delegation of IDN variant TLDs to promote accessibility of IDNs;
- The development of a procedure to govern the allocation of IDN variant TLDs in coordination with the GNSO and ccNSO;
- The definition of “same”, with respect to IDN variant labels, is given by each script community, and confusability (visually, phonetically or otherwise) should not be construed as the sole criterion for variant definition as stated in the [LGR Procedure](#);
- Each variant TLD is a TLD on its own right, once it is delegated.

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.

Furthermore, if the proposed Draft Recommendations are adopted by the community the RySG strongly agrees that:

1. there will be a need to adjust gTLD registry agreements in relevant areas, such as sponsorship of an IDN TLD variant set, IDN implementation requirements at the second level, Registry Transition Process, EBERO process, among others;
2. this work is intended for the community to consider for developing appropriate management mechanisms for IDN variant TLDs. Until such mechanisms are finalized by the community and approved by the ICANN Board, the restriction on the delegation of IDN variant TLDs will continue to remain applicable;
3. the IDN Implementation Guidelines are not product of consensus policy, therefore new bottom-up policy must be developed to govern allocation and/or activation of IDNs at the second level going forward.

With this context the RySG offers the following comments.

Comments on Draft Recommendations

Recommendation 1. Root Zone Label Generation Rules (RZ-LGR) the only source for valid TLDs and their variant labels

The RySG supports the concept that there should be only one source to validate TLDs and their variant labels. In this regard, we agree with utilizing the Root Zone Label Generation Rules (RZ-LGR), as defined in the [LGR Procedure](#), as the only source to validate TLDs and calculate their variant labels. To be clear, we mean all TLDs, and not only IDN TLDs.

At the same time, the RySG wishes to note that the current RZ-LGR (i.e. RZ-LGR-2) does not support a wide range of scripts. Recommendation 1 states *“TLDs and their variant labels in the scripts not integrated in the RZ-LGR are undefined and, therefore, cannot be applied for or allocated”*. Consequently, the RySG urges ICANN and/or the corresponding working group to complete the RZ-LGR to ensure maximum coverage of most modern scripts.

Recommendation 2. IDN variant TLDs {t1, t1v1, ...} allocated to the same entity

The RySG agrees that IDN Variant TLDs must be allocated (or withhold for possible allocation) to the “same entity” (i.e. the same registry operator or sponsoring organization) via each registry agreement between registry operator and ICANN. The RySG agrees that if the Draft Recommendations are adopted, ICANN (in coordination with the GNSO and ccNSO) would need to update certain procedures and policies to incorporate the “same entity” principle to ensure IDN Variant TLDs are kept under the same registry operator from delegation through any future business transactions to the termination of the registry agreement and/or EBERO transition, if applicable.

It is important to note that technical implementation of IDN variant TLDs may vary by registry operator and some registries may have intellectual property related to managing variant or bundle of DNS labels.

See comment on same registry service provider below in Recommendation 7.

Recommendation 3. Same second level labels under IDN variant TLDs $s1.\{t1, t1v1, \dots\}$ registered to the same entity

The RySG agrees that each same second level label (or variant second level label) under IDN variant TLDs is registered to the same entity. Furthermore, the RySG strongly agrees that “ICANN shall take no position on the variant-handling policies beneath delegations it makes, except to require that any label allocated in one variant of a TLD IDL set must be allocated to the same entity in every other label in the IDL set” (Section 4.4 of Motivation, Premises and Framework). Registry operators and registrars should, at their discretion, agree on a common definition and implementation of the same entity principle, such as using the ROID or any other workable solution.

Recommendation 4. Second-level variant labels under IDN variant TLDs $\{s1, s1v1, \dots\}.\{t1, t1v1, \dots\}$ registered to the same entity

See comments in Recommendation 3 above.

Recommendation 5. Second-level IDN tables offered under IDN variant TLDs harmonized

The RySG agrees second level IDN tables under IDN variant TLDs should be harmonized, that is, mutually coherent but not necessarily identical. RySG also notes, this requirement is already covered in version 4 of the IDN Implementation Guidelines.

Recommendation 6. Second-level variant label allocatable or activated under IDN variant TLDs not necessarily same

The RySG agrees with the premise that second-level variant labels allocated or activated under IDN variant TLDs may not be necessarily the same. Furthermore, activation or allocation of variant labels should be left to registry operator policy (provided its registry agreement allows it). Therefore, we see this more as a clarification rather than a recommendation.

Recommendation 7. Same registry service provider for IDN variant TLDs

The RySG agrees that IDN variant TLDs must be operated by the same registry service provider to ensure the IDN variant TLD set is managed in a coherent way.

Recommendation 8. Same nameservers for IDN variant TLDs, unless otherwise justified

The RySG ask ICANN to reconsider this recommendation and remove the same nameserver requirement. While it may be a common business practice to configure each of the zones in an IDN variant TLD set under the same set of nameservers, registry operators (and by extension registry service providers) need the operational flexibility to make configuration changes without the need to apply for permission (e.g. change request) or worrying about a potential breach of the contract.

Recommendation 9. Update existing policies and associated procedures to accommodate the recommendations for IDN variant TLDs

The RySG supports updating relevant existing policies by using appropriate mechanisms in coordination with the GNSO and ccNSO. Further, the RySG agrees “this work is intended for the community to consider for developing appropriate management mechanisms for IDN variant TLDs” (Page 2, Executive Summary).

Recommendation 10. All other existing TLD policies and procedures apply to IDN variant TLDs, unless otherwise identified

The RySG agrees “*this work is intended for the community to consider for developing appropriate management mechanisms for IDN variant TLDs*” (Page 2, Executive Summary).

In closing, the RySG hopes these comments to the Draft Recommendations are useful and stands ready to answer any clarifying question ICANN Board or Staff may have.
