

Consolidated comments on Topic list for Initial Report on introduction IDN ccTLD under fast track

1. Introduction

Under the charter, the purpose of the IDNC WG is to develop and report on feasible methods, if any, that would enable the introduction, in a timely manner and in a manner that ensures the continued security and stability of the Internet, of a limited number of non-contentious IDN ccTLDs, associated with the ISO 3166-1 two-letter codes, while the overall policy is being developed.

	Comment By	Date	Comment	CD/BB Response
1	EU	19-12-07	Add the words '(both the official code list of ISO 3166-1 and the list of reserved ISO 3166-1 code elements)'	These are included in the draft Initial Report in Section 1

The scope of the IDNC WG is limited to developing feasible methods (for the introduction of a limited number of IDN ccTLDs) that do not pre-empt the outcomes of the IDN ccPDP.

In considering feasible methods the IDNC WG should take into account and be guided by:

- The overarching requirement to preserve the security and stability of the DNS;
- Compliance with the IDNA protocols;
- Input and advice from the technical community in respect to the implementation of IDNs;
- Current practices for the delegation of ccTLDs.

In order to achieve the purpose 2 specific mechanisms are required:

1. A mechanism for the selection of the IDN ccTLD string (section 2 below); and
2. A mechanism to designate an IDN ccTLD manager (section 3 below).

The aim of this document is to produce a list of topics that will need to be considered in developing the mechanisms. Accordingly, comment and input is sought on the relevance of the topics listed and whether there are additional topics.

The list of topics will be used to form the structure of discussion on the mechanisms and which will flow from the first draft of an initial report.. For a detailed schedule see section 4 below.

2. Mechanism for the selection of an IDN ccTLD string in the fast track

The first task of the IDNC WG is to develop a selection mechanism for IDN ccTLD strings bearing in mind the limitations and guidelines canvassed in section 1 above

Topics:

- What are the requirements regarding the status of the script/language in the territory to be used in the IDN ccTLD string?

	Comment By	Date	Comment	CD/BB Response
2	EU	19-12-07	“Should there be specific requirements regarding the status of the script/language in the territory to be used in the IDN ccTLD string? If so, who should determine such requirements for each individual IDN ccTLD string? To what extent do the GAC principles for ccTLDs apply in relation to the selection of appropriate strings?”	There is different wording in the draft Initial Report at 3 A (ii). In respect to the GAC principles; the phrase ‘current practices for the delegation of ccTLDs’ is intended to include the GAC principles as an overarching consideration. However, in the context of string selection, the GAC principles were not drafted or designed to deal with this. Whether or not the principles should apply would first need to be agreed by GAC and then considered under the PDP.

- Is there a limit to the number of scripts per territory to be used as an IDN ccTLD under the fast track approach? Should it be limited to one (1) per territory or some other number?

	Comment By	Date	Comment	CD/BB Response
3	EU	19-12-07	“Should there be a limit to the number of scripts per territory to be used as an IDN ccTLD under the fast track approach? Should it be limited to one (1) per territory or some other number? Are there legitimate reasons why such a limit is impractical in some cases?”	There is different wording in the draft Initial Report at 3A(i). The context of limiting the number of scripts is the overarching requirement not to impinge on policy. This is covered in the draft Initial Report.

- Who should be able to propose a string for the territory?
- Who is required to endorse a string once proposed?
- What are the criteria for such a string to be acceptable under the fast track (for example: meaningful representation in a selected script of the name of the territory or recognized abbreviation as listed on ISO 3166 -1)

	Comment By	Date	Comment	CD/BB Response
4	EU	19-12-07	'What are the criteria for such a string to be acceptable under the fast track (for example: on the one hand, a meaningful representation in a selected script of the name of the territory or recognized abbreviation as listed on ISO 3166 -1 or, on the other hand, compliance with criteria to be established by the relevant national authority?)'	There is different wording in the draft Initial Report at 3B(i). With respect to the national authority point, this would pre-empt the outcome of the PDP and therefore would not fit under the fast track.
	Comment By	Date	Comment	CD/BB Response
5	Hiro Hotta	11-01-08	I propose to add abbreviation of the territory name" to the examples of meaningful representation. Abbreviation of a formal territory name is often used in some territories and it's natural to be the ccTLD string for the territory.	This has been added in the draft Initial Report at 3B(i).

- Will a proposed string be 'evaluated' against criteria? If so, who will the 'evaluator' be and who will appoint them?

	Comment By	Date	Comment	CD/BB Response
6	EU	19-12-07	'Will a proposed string be 'evaluated' against criteria? If so, who will the 'evaluator' be and who will appoint them? Given the variety of different models that exist for ccTLD-government relations, to	There is different wording in the draft Initial Report at 3B(ii). The appropriateness issue is covered by the general question on whether evaluation should happen or not.

			what extent is it appropriate to seek a uniform approach to evaluate the various proposals expected to be submitted for IDN ccTLDs?	
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- o Assuming a string and script are selected in accordance with proposed criteria, should there be an objection procedure? If so, who should be eligible to object? On what grounds? What is the impact of an objection (for example non-eligibility under fast track)?

	Comment By	Date	Comment	CD/BB Response
7	Patrik Fältström	14-12-07	there must be not only question on who can appeal a decision, and on what grounds, but also what the resolution process is. For example if there will be collisions. Between strings allocated in the fast track and strings that "potentially is to be allocated in the slow track".	There will be technical requirements for string selection (see draft Initial Report para 3B (i) and (ii) to deal with collisions etc. The objection process question is meant to deal with objections to the string itself on a non-technical basis. In other words the name would have to be 'approved' as meeting all the fast track requirements and could then be objected to by another party.
8	EU	19-12-07	How can ICANN ensure that any such objection procedure is in line with paragraph 63 of the Tunis Agenda?	This is outside the scope of the IDNC Working Group.

3. Mechanism to designate an IDN ccTLD manager.

The second task for the IDNC WG is to develop a mechanism for designating the manager for an IDD ccTLD bearing in mind the limitations and guidelines canvassed in section 1 above and especially the criteria that apply for the designation of an ASCII ccTLD. These include, amongst others things: documented support of the Local Internet Community; documented support from the relevant public authority; and technical capability of the manager.

	Comment By	Date	Comment	CD/BB Response
9	Bill Semich	16-12-07	I propose to change that wording to text that is more consistent with RFC 1591, under which the majority of existing ccTLD managers currently operate. "These include, amongst others things: documentation that significantly interested parties in the domain have agreed that the designated manager is the appropriate party and that the manager is technically capable."	The draft of the Initial Report does not contain either version. Designation of ccTLD manager needs to be dealt with under current IANA practices for delegation.

	Comment By	Date	Comment	CD/BB Response
10	Hiro Hotta	11-01-08	Documented support from the LIC and government is not the globally-established requirement to designate an ASCII ccTLD manager. For example, it is not always possible that government issues formal documents to endorse private-sector-driven services. I think the necessity of the documentation itself is an issue. So, I propose that the following statement in the draft Section 3 These include, amongst others things: documented support from the relevant public authority;" be revised as seen below and be categorized as the topic on selection process: "How should the support from the relevant public authority be demonstrated? Are formal documents needed?"	The original version does not appear in the draft Initial Report. Designation of ccTLD manager needs to be dealt with under current IANA practices for delegation.

Topics:

- Should any criteria specific to IDNs be taken into consideration for the designation of an IDN ccTLD manager?

	Comment By	Date	Comment	CD/BB Response
11	EU	19-12-07	'Should any criteria specific to IDNs be taken into consideration for the designation of an IDN ccTLD manager? Who should define and evaluate compliance with any applicable criteria: ICANN or the local public authority in conjunction with the local Internet community?'	There is different wording in the draft Initial Report at 4A(i) including the question who should evaluate at 4A(ii). As to local public authority, see response to comment 4 above.

- Are there any specific requirements regarding the technical and operational readiness of the eligible IDN ccTLD manager?
- Should there be a proven track record for running a TLD operationally?

	Comment By	Date	Comment	CD/BB Response
12	EU	19-12-07	Would such a criteria act as a barrier to new entrants?	There is different wording in the draft Initial Report at 4A(iii). By definition, yes it would be a barrier. The question is for the WG is whether it should be requirement of the fast track in order to meet the overarching and technical requirements etc.

- Should the eligible entity have experience (operationally or experimentally) with running IDN in the relevant script at the second and /or higher levels?

	Comment By	Date	Comment	CD/BB Response
13	EU	19-12-07	Would such a pre-condition act as a barrier to new	There is different wording in the draft Initial Report at

			entrants?	4 A (iv). By definition, yes it would be a barrier. The question is for the WG is whether it should be requirement of the fast track in order to meet the overarching and technical requirements etc.
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- Should adherence to the IDNA protocol and related requirements be ensured? How should this be ensured?

	Comment By	Date	Comment	CD/BB Response
14	Edmon Chung	07-07-08	This seems to be pointing towards the topic of whether there should be some form of understanding or agreement between ICANN and the IDN TLD operator. In my personal opinion, consistent with 2. above (that certain requirements that do not currently apply to ccTLDs may be appropriate), it may be a good approach for the Fast Track to require some form of documented /executed commitment by the operator of a Fast Track IDN TLD (in what form, is something that should be explored).	The question of agreements is a matter between ICANN and the ccTLD and not within the scope of this WG.

- Is the registration policy of the IDN ccTLD relevant in relation to the IDNA protocols and related requirements? If so how is adherence to such required policy ensured?

	Comment By	Date	Comment	CD/BB Response
15	EU	19-12-07	To what extent do the GAC principles for ccTLDs apply in relation to the designation of an IDN ccTLD manager?	The GAC principles are included as part of the matters to be taken into account under the heading 'current practices for the delegation of ccTLDs).

	Comment By	Date	Comment	CD/BB Response
16	Hiro Hotta	11-01-08	<p>(1) comment-1 I think string selection mechanism is a pair of "selection criteria" and "a selection process". Correspondingly, manager designation mechanism is a pair of "designation criteria" and "a designation process". "Criteria" and "a process" had better be separated for us to understand the mechanism clearly. However, it looks like the current draft commingles topics on criteria and topics on process, which makes the list somewhat complicated.</p> <p>(2) comment-2 I think "the process of selection of a string" and "the process of designation of a manager" cannot be separated in some cases, especially in the fast track.</p> <p>(3) comment-3 As a result of comment-1 and comment-2, I'd like to propose the following categorization of topics, which would make the list more clear-cut.</p> <p>(a) Criteria for the selection of the IDN ccTLD string (b) Criteria for the designation of the IDN ccTLD manager (c) Process for the selection of the string and its manager meeting the criteria (a) and (b)</p> <p>(8) comment-8 : proposed document Based on the above comment-1 to 7, let me propose a revised topic list, which is expected to substitute Section 2 and 3 in the</p>	<p>We think that the draft Initial Report whilst not following the suggested categorization does, by it's structure, deal with the points raised.</p>

			original draft.	
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	Comment By	Date	Comment	CD/BB Response
17	Hiro Hotta	11-01-08	I propose to add the following topic, which may be vital for the IDN registration service, on criteria for IDN ccTLD manager designation. "Should IDN ccTLD manager be required to be capable of providing registration services, such as documentation of terms and conditions and customer support, in the proposed script and language?"	This is outside of the scope of the WG. It is covered by the IANA delegation processes which are part of the overarching considerations.

18	Hiro Hotta	11-01-08	I propose to add the following topic, which may be vital for the IDN registration service, on criteria for IDN ccTLD manager designation. "Should IDN ccTLD manager be required to be capable of providing registration services, such as documentation of terms and conditions and customer support, in the proposed script and language?"	This is outside of the scope of the WG. It is covered by the IANA delegation processes.
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19	Hiro Hotta	11-01-08	I propose that the following be added as the topic on process. "Who is required to endorse an IDN ccTLD manager?"	Designation of ccTLD manager needs to be dealt with under current IANA practices for delegation.
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4. Schedule and action list

See update Schedule and action list in draft Initial Report.

References

ICANN Board resolution 2 November 2007:

http://www.icann.org/minutes/resolutions-02nov07.htm#_Toc55609363

Charter IDNC Working Group:

<http://www.ccnso.icann.org/workinggroups/idnc-charter.htm>

ICANN IDNA Guidelines:

<http://www.icann.org/announcements/announcement-2-11may07.htm>

Other documents which may be of relevance and not referenced in Charter IDNC Working Group

RFC 4290 Suggested Practices for Registration of Internationalized Domain Names (IDN). J. Klensin. December 2005. (Format: TXT=71115 bytes) (Status: INFORMATIONAL)

<http://www.rfc-archive.org/getrfc.php?rfc=4290>

RFC 4690 Review and Recommendations for Internationalized Domain Names (IDNs). J. Klensin, P. Faltstrom, C. Karp, IAB. September 2006. (Format: TXT=100929 bytes) (Status: INFORMATIONAL)

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"Internationalizing Domain Names for Applications (IDNA): Issues and Rationale", John Klensin, 18-Nov-07, <draft-klensin-idnabis-issues-05.txt>

<http://www.ietf.org/internet-drafts/draft-klensin-idnabis-issues-05.txt>

"Internationalizing Domain Names in Applications (IDNA): Protocol", John Klensin, 18-Nov-07, <draft-klensin-idnabis-protocol-02.txt>

<http://www.ietf.org/internet-drafts/draft-klensin-idnabis-protocol-02.txt>

"An IDNA problem in right-to-left scripts", Harald Alvestrand, Cary Karp, 12-Jul-07, <draft-alvestrand-idna-bidi-01.txt>

<http://ietfreport.isoc.org/idref/draft-alvestrand-idna-bidi/>

"The Unicode Codepoints and IDN", Patrik Faltstrom, 18-Nov-07, <draft-faltstrom-idnabis-tables-03.txt>:

<http://www.ietf.org/internet-drafts/draft-faltstrom-idnabis-tables-03.txt>