# New SLAs for Publication of the Label Generation Rulesets for Internationalized Domain Names Change Analysis

The IANA Naming Function Contract specifies a set of Service Level Agreements (SLAs) which Public Technical Identifiers (PTI) must adhere to and which the Customer Standing Committee (CSC) is empowered to oversee. ICANN, PTI and the CSC have developed a new “[Process for Amending the IANA Naming Service Level Agreements](https://www.icann.org/en/system/files/files/iana-naming-sla-amend-process-17dec18-en.pdf)”*.* The process is a guide for determining SLA changes and provides a method for doing so that includes appropriate consultation and agreement levels. This process contains safeguards and mechanisms to ensure that due diligence will be followed in making changes to the SLAs.

None of the requirements in the process for amending IANA Naming SLAs overrides any obligations within the IANA Naming Functions Contract.

Per the SLA change process, “If the CSC and PTI reach a mutual decision to proceed with the SLA change, PTI should draft a change recommendation, which includes an impact analysis that expands with further detail based on their earlier discussions during the ‘procedure for determining that a SLA needs amending’ stage.” In accordance with the SLA change process requirement, PTI is providing the following analysis requesting that PTI, CSC and ICANN agree to establish SLAs for the publication of the Internationalized Domain Name (IDN) tables and Label Generation Rulesets (LGRs) in the IDN Practices Repository.

The Repository of IDN Practices was created to support the development of the internationalized domain names (IDNs) by promoting the sharing of registry IDN policies. The policies are referred to as “Label Generation Rulesets” (LGRs), and historically as “IDN tables” or “variant tables.”

Registries implementing IDN support are encouraged, and sometimes contractually required, to utilize this repository to publish their LGRs.

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| **BACKGROUND BEHIND REQUEST FOR NEW SLAs** |
| Publication of IDN tables or Label Generation Rulesets (LGRs)  IDN tables and Label Generation Rulesets (both of which will be referred to as “LGRs” in this document) are published in the IDN Practices Repository on iana.org. The IANA Naming Function Contract requires maintenance of this repository, thereby placing the monitoring of this activity within the CSC’s purview, but it did not define any SLAs for this deliverable.  The CSC later determined that a metric should be applied to LGR maintenance, but new metrics/changes to metrics could not put into place until an SLA change process had been established. At the same time, it was determined that publishing LGR processing data on the SLE Dashboard and in the IANA Naming Function Monthly Performance Report would give more visibility to the current processing times for LGRs. As a result, the CSC and PTI opted to publish the LGR data in the monthly performance reports while working on a process to introduce new SLAs. (CSC Meeting 9, 19 April 2017). The publication of the LGR data in the PTI Report was confirmed for the June 2017 report (CSC Meeting 12, 17 July 2017).  The CSC initiated the SLA request to add SLAs for LGR processing times, with ICANN and PTI in agreement. |

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| **SYNOPSYS OF REQUST FOR NEW SLAs** |
| The LGR request lifespan consists of the submission of the request; a staff review of the request against the formatting and presentation requirements listed at <https://www.iana.org/help/idn-repository-procedure>, which can result in a remediation or clarification request to the submitter; confirmation of the validated submission by the TLD’s authorizer; and implementation of the request.  The proposed SLAs (below) reflect the fact that the submission, validation, and implementation of requests for LGR publication and modification are currently manual processes. In addition, the total number of LGRs to be published or modified in the implementation of a single request can range from a single entry to more than one thousand. |

**CURRENT AND PROPOSED SLA THRESHOLDS**

**Summary of new SLAs for Publication of LGRs considered by the CSC:**

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| Metric | Threshold | Type | Breach | Period | Mechanism | Implementation details |
| Validation and Reviews: Time to confirm that a submission is well-formed or send it back for remediation. | ≤ 5 days | Max | 90% | Month | Publish in dashboard | The SLA dashboard is already tracking this information; however, no has been defined. Once a threshold has been defined, PTI will apply the threshold to the SLA dashboard and monthly performance report. |
| Implementation: Time from the point at which the request is ready for implementation until request completion. | ≤ 7 days | Max | 90% | Month | Publish in dashboard | The SLA Dashboard is already tracking this information; however, no SLA has been defined. Once a threshold has been defined, PTI will apply the threshold to the SLA dashboard and monthly performance report. |

In addition, the IANA SLA Dashboard will continue to provide the following informational data on IDN Table or LGR overall request volumes and processing times:

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| Data | Mechanism | Implementation Details |
| Requester Clarification: The number of times a clarification or remediation was required from the requester. | Publish in dashboard | None. SLA Dashboard is already tracking this data. |
| Time per Actor: Average time taken for staff processing, requester clarification, administrative contact authorization and regulatory checks. | Publish in dashboard | None. SLA Dashboard is already tracking this data. |
| Request Volumes: Total number of LGRs added or modified. | Publish in dashboard | None. SLA Dashboard is already tracking this data. |

**CHANGE CATEGORY**

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| **SLA AMENDMENT CATEGORY** |  |
| X | i. New SLA |
|  | ii. Remove SLA |
|  | iii. Change to SLA definition and target/threshold |
|  | iv. Change SLA Item target/threshold only |

**IMPACT ANALYSIS**

Per the SLA change process, an SLA change proposal should also include an analysis of “impact on potential resources, budget requirements following the PTI and ICANN budgetary processes, and an implementation plan per the PTI and/or ICANN implementation process, should the SLA changes be approved. Prior to moving forward with the recommendation, the CSC and PTI should agree on how PTI can support the implementation of the draft SLA change recommendation. PTI and/or ICANN shall publicly post the draft SLA change recommendation will be based on, and after impact completion of this analysis.”

The following section provides an impact analysis per the SLA change process requirements.

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| **Benefit to the Community** |
| LGRs are published in the IDN Practices Repository on iana.org, but SLAs have not yet been created to indicate whether submissions were processed and the repository was updated in a timely and accurate fashion. New SLAs will ensure that LGR request processing will be subject to metrics and oversight, as with all other IANA Naming Function activities. |
| **Feasibility of Implementation** |
| The LGRs are already published in the SLE Dashboard and thus in the IANA Naming Function Monthly Performance Report, but establishing governing metrics will require programming time to automate. |
| **Budget Requirements** |
| Automating new SLAs will take two (2) business days of one (1) developer’s. |
| **Risk Analysis** |
| No risks have been identified. |

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| **PTI IMPLEMENTATION PLAN** |
| Automating new SLAs will take two (2) business days of one (1) developer’s time. As for implementation time, PTI commits to implementing the change within one (1) calendar month of the SLA approval (implementation time). The new SLAs will become effective on the first of the calendar month following the implementation period. To implement this change, PTI will follow internal processes to schedule development time to make the coding changes, test the changes, and deploy an updated SLE Dashboard and report generation tool to reflect the changes. |

**NEXT STEPS FOR CATEGORY i. NEW REQUEST**

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| **Step** | **PROCESS REQUIREMENT** | **STATUS** |
| 1. | SLA request distributed to the CSC and PTI | Completed |
| 2. | Request Analysis (this document qualifies) completed and distributed to the CSC, PTI and ICANN | Completed |
| 3. | The CSC, PTI and ICANN discuss whether to proceed and one of the entities summarizes the results in writing for all the other parties.  Results:  If either party decides not to proceed, the process ends, and the SLA is not amended.  OR  If all parties decide to proceed, continue |  |
| 4. | Impact Analysis completed by PTI and posted by PTI/ICANN for community access |  |
| 5. | The CSC circulates SLA Request to their stakeholders |  |
| 6. | ICANN opens a Public Comment Period complying with ICANN’s designated practice for public comment periods, per the CSC Charter 17.3.d. |  |
| 7. | ICANN publishes a Public Comment Report |  |
| 8. | Based on the potential degree of impact if the draft SLA recommendation is approved, the CSC may decide to perform additional community consultations such as, but not limited to, open sessions at ICANN meetings, etc. |  |
| 9. | the CSC and PTI discuss all community input and make any changes, completing a Final SLA Recommendation. If one entity now objects to the SLA Change this process ends. |  |
| 10. | the CSC seeks approval from the GNSO and ccNSO Councils on the Final SLA Recommendation |  |
| 11. | PTI implements the SLA changes in accordance with the implementation plan provided earlier in the process for the final SLA recommendation. |  |
| 12. | ICANN and PTI update the SLA Tables on the PTI SLA webpage, upon which the new SLA(s) become effective. |  |