The ICANN GNSO "Business Constituency"

ICANN Business Constituency (BC) Comment

on

String Similarity Review Guidelines

10-Apr-2024

The Business Constituency (BC) considers *String Similarity Review* a critical aspect of the New gTLD Program, to maintain Internet user trust in the Internet ecosystem and in the DNS. The BC has reviewed the String Similarity Review Guidelines and has following comments on the draft document:

1. Section 2.1 (*Confusability*) lacks some examples and currently it is slightly vague and difficult to understand. Including some comparisons/examples (like section 2.2 and 2.3) will greatly help in elaborating the Confusability concept.

   As expressed by the BC in the 2012 gTLD expansion, ICANN must prevent confusability surrounding singular and plural versions of the same string, particularly in European languages in Latin script. As we wrote in our 2013 comments:

   > We believe that allowing singular and plural versions of the same TLD string will confuse users and frustrate efforts by registrants to build awareness of new domains in new TLDs. The existence of identical second-level domains and their corresponding email addresses on nearly identical TLDs could also create vulnerability to spoofing and phishing fraud. Moreover, conflicting decisions are generating predictably negative reaction and will undermine the credibility of ICANN and our multi-stakeholder model.

   > Looking further ahead, launching both singular and plural versions of the same string would set a troubling precedent for future gTLD rounds, where applicants could file for plural versions of existing TLDs or new TLDs approved during the present expansion. It's inconceivable that ICANN would allow this in future Guidebooks, but that would require a reversal of today's policy and expose the entirely avoidable mistake of allowing singulars and plurals in the current round.

   > An ideal opportunity to reconsider the singular/plural decisions of ICANN's string similarity panels was provided in March through the 2013 Beijing GAC Communiqué:

   >> *The GAC believes that singular and plural versions of the string as a TLD could lead to potential consumer confusion. Therefore the GAC advises the ICANN Board to: Reconsider its decision to allow singular and plural versions of the same strings.*

   > However, ICANN's Board disregarded GAC Advice and stuck by existing mechanisms and prior expert decisions. The rationale given by the Board revealed concern that making changes in singular/plural TLDs "would cause a ripple effect and re-open the decisions of all expert panels." While this is a valid concern, we believe it is far outweighed by the Board's obligation to ensure

that TLD expansion validates the effectiveness of the ICANN model in serving the public interest of global Internet users.

ICANN must address the singular-plural confusion issue, even if only for those "certain European languages" cited in the Annex of the draft report.   **As we did a decade ago, the BC emphatically urges the ICANN Board to develop guidelines to prevent delegation of both singular and plural forms of the same string, where are confusingly similar when the plural is just the singular plus the letter "s".**

2. Allocation of *semantic* and *phonetic* IDN variants (of already delegated TLDs) pose a greater threat to TLD operators and therefore raises concern for the BC. Delegating of such new semantic and phonetic variants pose significant risks to the DNS, Internet companies, and their users. Section-10.1 (Steps in String Similarity Review) or any other section in the document, do not well elaborate about the semantic and phonetic equivalence. Therefore, more explanation or references should be added to the draft in this regard.

3. Add a ***flow chart*** for the pre-screening and post-screening processes (as explained in Section-10, 11 and 12) will make the two distinct processes further clearer.

4. The document doesn't cover any process/guideline to review an *appeal* or *observation* raised against the String Similarity Review by any TLD operator. Adding this to the document will promote transparency in the process and ultimately result in more consistent decisions based on String Similarity Review process.

This comment was drafted by Hafiz Farooq and Steve DelBianco.
It was approved in accord with our charter.