

From: Patricio Poblete

Date: Tuesday, June 2, 2026

To: Alejandra Reynoso Barral

Cc: Board Caucus on IDN ccTLDs (ccPDP4), ccNSO Secretariat, Tripti Sinha

Subject: Request for clarification or confirmation of interpretation wrt IDNccPDP4

Dear Alejandra,

I am writing to inform the ccNSO of the progress made regarding the Board's consideration of the proposed policy recommendations for the (de-)selection of IDN ccTLD strings and related variants (ccPDP4 IDNs) and to request clarification and confirmation on several points identified during the implementation feasibility assessment.

As you know, the Board Caucus was formed in June 2024 with three objectives:

- (i) To evaluate the proposed policy for the (de-)selection of IDN ccTLD and related variants, and provide recommendations to the Board, including through potential dialogue with the ccNSO Council when needed.
- (ii) To provide strategic advice to ICANN org during the implementation phase of the proposed policy.
- (iii) To develop a Supplemental Board Statement and engage in subsequent dialogue in the event the Board does not accept the recommendations.

Following the closure of the Public Comment period and the solicitation of GAC advice as mandated by ICANN Bylaws, ICANN staff initiated an in-depth analysis of Part A of the Board Report submitted in June 2024. This analysis is intended to support the assessment of implementation feasibility and ensure that ICANN's understanding and interpretation of the policy recommendations align with the ccNSO's intent. As part of this work, four (4) areas were identified where additional information from the ccNSO would be beneficial to finalize the feasibility assessment for implementing the proposed policy.

The additional information is requested using two types of questions:

- Requests for Confirmation: The purpose of these requests is to seek confirmation from the ccNSO that ICANN's understanding and/or interpretation of a specific section is correct and aligns with what the ccNSO intended.
- Requests for Clarification: The purpose of these requests is to seek further information or clarification from the ccNSO on a specific topic that is not clear from the language of the Policy.

The attached document sets out the questions identified during the process and organized into columns as follows:

- Column A: Request number (1 through 4)
- Column B: Topic
- Column C: Relevant section in the Board Report
- Column D: Request
- Column E: Open space for ccNSO comments

We understand that the ccNSO may require time to respond fully. Based on previous experience with the ccPDP3 Review Mechanism, we believe that discussing these points may help ensure a clear and shared understanding of the ccNSO's intent and objectives for the ccPDP4 IDN ccTLD Policy.

Should the ccNSO have any questions on this matter in the interim, please do not hesitate to contact me.

Kindest regards,

Patricio Poblete, Chair Board Caucus IDNccPDP4

Annex A - List of questions

#	Section Board Report	Text	Request	ccNSO Response
1	Part A Section 5.4	If a Selected IDNccTLD is deselected as result of the lack of support by the Significantly Interested Parties (see section 4.2.2 for definition of SIP and section 12.5 below for the mechanism) then a Delegated Variant may remain to be delegated if the Significantly Interested Parties explicitly support continuation of the delegation of the Delegatable variant IDNccTLD string.	Request for Clarification - If the primary TLD is no longer defined, the remaining variant set becomes ill-defined with respect to the RZ-LGR. This appears potentially inconsistent with IDN ccPDP4 recommendation 5.2.1.: “a variant alternative meaningful representation of the name of the country in a designated language is selected as the alternative IDNccTLD string (as a new primary string), and the newly identified primary IDNccTLD string and the remaining Delegatable variant IDNccTLD string must be a well-formed variant set.” From an implementation perspective, invoking this exception may require the IDNccTLD manager and the SIP to: - identify the new primary string and the variant strings that form a well-formed variant set; - provide supporting documentation from the SIP for re-evaluation; and - agree to revoke the original primary string together with any unsupported variant strings. Please clarify how ccNSO envisions this process working in practice, including how a new selected (primary) string would be identified and validated to ensure that the resulting variant set remains well-formed.	
2	Section 1, Principle I and	Association of the (IDN) country code Top Level Domain with a territory. For purposes of this policy “Territory” or “Territories” are defined as a country, a subdivision, or other area of particular geopolitical interest listed in Section 3 of the ‘International Standard ISO 3166, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes’ [ISO 3166-1:2020] or, in some exceptional cases, e.g. grandfathered-in delegations, a country, a subdivision, or other area of particular geopolitical interest listed for an exceptionally reserved ISO 3166-1 code element.	Request for Confirmation - Ensuring consistency and clarity between the policy definitions and the ISO3166 standard during implementation and over time is essential.	
	Section 12.1	Under the current policy for delegating (ASCII) ccTLDs, only the country codes associated with Territories are eligible for delegation as ccTLDs. Therefore, only IDNccTLD strings related to a Territory qualify for delegation as ccTLDs.	The definitions and rules underpinning the ISO3166 standard have evolved over time and may continue to change in the future, potentially impacting ccTLD eligibility criteria and retirement process.	

			Please confirm whether the ccNSO envisions the establishment of a formal process, including an appropriate approval mechanism for updating relevant definitions and implementation guidance as the ISO 3166 standard evolves over time. If so, please clarify whether such a process should be developed during the implementation phase and validated by the ccNSO.	
		Section 12.1 - If the name of a Territory is removed from ISO3166 because it is divided into two or more new Territories or two or more Territories have merged, the removal is considered a “trigger event” and causes the initiation of the process for the retirement of all the selected IDNccTLD(s) (and their variants), which are a meaningful representation of the name of the Territory.		
3	Sections 12.2, 12.3 and 12.4	ICANN is not expected to actively seek confirmation of the association or disassociation of an IDNccTLD string with the name of the territory (passive role).	Request for Confirmation - Please confirm whether ICANN may follow up with the ccTLD manager whenever there is a reasonable presumption of a change in the Designated language, the script, or the name of territory in the Designated Language. When such a follow-up occurs, ICANN may request the ccTLD Manager to provide a Statement of Association, Statement of Designation of Language or Statement of Referenced Script, as applicable, to confirm whether the IDNccTLD continues to meet the string selection criteria as recommended.	
4	Part A Section 13.2	Further clarification would be helpful regarding the intended scope and effect of this section, particularly in light of the following Working Group (WG) observations: - The validation procedure includes a mechanism for dialogue before a final decision becomes definite. - ICANN is advised to make use of this mechanism to avoid mistakes and/or to clarify its initial, tentative findings to allow the applicant to adjust the application if necessary. - The validation by ICANN is first and foremost an administrative check - Finally, the same application could be resubmitted pointing out there was a mistake.”	Request for Confirmation - Please confirm that the ccNSO intended the Selection Process, including the validation of IDNccTLDs and their related variants, to be excluded from the scope of the Independent Review Process (IRP) and Reconsideration Request process.	