

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.

Annex - List of questions

Question 1

Section Board Report	Text	Request	ccNSO Response
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.	The following general rules in the policy are relevant: 1. The selected or primary string determines the full set of (blocked and allocatable) variants using the RZ-LGR (section 5.2.1). This implies also that without a selected or primary string the full set cannot be determined. 2. If a selected IDNccTLD string and/or related Delegatable Variants (and other allocatable variants and/or blocked variants related to the Selected/primary string), are considered confusingly similar, the requested IDNccTLD string(s) is/are not valid and hence not eligible (section 7.5) 3. If the selected or primary string is retired, all related variants must be retired (section 11.1.2). The exception rule under consideration was introduced to decrease the administrative burden on both ICANN, the SIP, and the requestor in the event the SIP would like to replace the initially selected (primary) IDNccTLD string with a Delegatable Variant of that selected string. The rationale was that a Delegatable Variant meets all the selection requirements (meaningful representation of name of the territory in a designated language and related script, supported by SIP, and all relevant documentation would have been provided), with the assumption that replacement of the initially selected string by a Delegatable Variant the Technical and Confusing Similarity Criteria (section 6) should always be met, which requires validation (section 7). While the variant set derived from the initial selected string remains the same, independent of whether the initially selected or primary IDNccTLD string is part of the set, the disposition values of variants, including Delegatable variants, can change if the selected/primary TLD changes. In case the initially selected primary IDNccTLD of a variant set will be retired because it is no longer supported by the SIP (deselected), the suggested process is as follows:

			• The SIP and IDN ccTLD manager must select out of the remaining Delegatable Variants, a new Selected/primary IDNccTLD string (to meet rule 1 above). When selecting the new selected (primary) IDNccTLD string the SIP and IDNccTLD manager must provide documentation to that effect. • If no primary IDNccTLD string is selected the general rule applies, and the initially selected string and all related variants must be retired. • If a Delegatable Variant String is selected as primary string, two cases need to be distinguished with respect to determining the full set of variants (allocatable and blocked): 1. All identified variants of the initially selected IDNccTLD remain "allocatable" with the newly selected IDNccTLD string and the variant set remains well-formed. As a result the newly selected IDNccTLD string (a Delegatable Variant from the deselected primary string) and related variants do not need to go through the full application and validation process nor need to be retired. 2. If one or more Delegatable variant(s) TLD of the initially selected (primary) IDNccTLD changes from "allocatable" to "blocked" in respect to the newly selected primary IDNccTLD string, then all such "blocked" variant(s) IDNccTLDs need to be deselected/retired or not made available together with the initially selected IDNccTLD. • Following the determination of the full set, it must be validated that the newly selected (primary) IDNccTLD string is not confusingly similar to other strings, following the confusing similarity validation procedures. If the newly selected IDNccTLD string (the initial Delegatable Variant selected to become the selected/primary string) is deemed to be confusingly similar, it is not valid, and the general rule applies, and the de-selected string and all related variants must be retired (rule 3 above).
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Question 2

Section Board Report	Text	Request	ccNSO Response
Section 1, Principle I and Section 12.1	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. 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. 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.	Request for Confirmation - Ensuring consistency and clarity between the policy definitions and the ISO3166 standard during implementation and over time is essential. 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.	The ccNSO will work to ensure that, where necessary, there is consistency and clarity of definitions. The ccNSO refers to the Glossary included in both ccPDP3 Board Reports. These Glossaries include relevant definitions both from the ISO3166 standard and ISO’s on-line browsing platform (OBP). In addition the ccNSO points to the request for clarification in response to the questions from PTI (https://itp.cdn.icann.org/en/files/council/reynoso-to-davies-10Apr25-en.pdf). We note that the authoritative definitions with respect to ISO3166 are included in the standard itself and not in the OBP. The ccNSO also notes there are discrepancies - and hence potential room for confusion - between terminology used in the ISO Standard and in the Root-Zone Database. For example, the term “unassigned” is used in both contexts however each with a distinct meaning. We assume IANA will resolve these if considered necessary.

Question 3

Section Board Report	Text	Request	ccNSO Response
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.	With the “not expected to actively seek” language the policy intended to reflect that ICANN should not police compliance with the requirement. However, the ccNSO agrees that whenever there is a reasonable assumption, for example a change in the French or English transliteration of name of a territory in the ISO3166 list, or GAC accreditation process, ICANN may follow-up and request one of the Statements.

Question 4

Section Board Report	Text	Request	ccNSO Response
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.	The ccNSO Council confirms that all claims and disputes relating to the process for the selection of IDNccTLDs strings and related variants (Board Report part A sections 1-10) should be excluded from the Independent Review and Reconsideration Process. The proposed process includes various consultation and review mechanisms allowing requestor/applicants review of decisions and ask questions. In addition, the process is on-going, allowing for adjustment and renewal of requests and applications.