
Public Comment Summary Report

ccNSO PDP4 Initial Report on the (de-) selection of IDNccTLDs

Open for Submissions Date:

Wednesday, 16 August 2023

Closed for Submissions Date:

Wednesday, 27 September 2023

Summary Report Due Date:

Wednesday, 18 October 2023

Category: Policy

Requester: Country Code Names Supporting Organization (ccNSO)

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Open Proceeding Link: <https://www.icann.org/en/public-comment/proceeding/ccnso-pdp4-initial-report-on-the-de-selection-of-idnccTlds-16-08-2023>

Outcome:

In total four (4) submissions were received: two (2) from community groups, one (1) from an individual, and one (1) from ICANN org.

The comments are categorized as general observations and specific issues. This Public Comment summary report includes the ICANN org staff summary of the comments and observations on the topics raised by the submitters in relation to the scope of the policy recommendations.

The working group will review the comments in more detail and where needed adjust the recommended policy. The review will be included in the working groups final report.

Section 1: What We Received Input On

The ccNSO Policy Development Process (PDP) 4 Working Group was seeking community input and comments on the proposed policy. The proposed policy focuses on four (4) stages with respect to Internationalized Domain Name country code Top Level Domains (IDNccTLDs):

- i. the selection of the IDNccTLD string and related variants;
- ii. the validation of the selected IDNccTLD string and its variants;

- iii. the delegation, transfer, and revocation of the IDNccTLD string and its variants and, the retirement of the IDNccTLD string and its variants, and finally,
- iv. the potential review of specific decisions pertaining to the delegation, transfer, revocation and retirement of an IDNccTLD strings and its related variants.

The proposals do not amend or change current policies for the delegation, transfer, revocation, and retirement of ccTLDs including IDNccTLDs, rather they build on these policies.

Section 2: Submissions

Organizations and Groups:		
Name	Submitted by	Initials
TWNIC	Anthony@TWNIC....	TWNIC
ICANN org	Pitinan Kooarmornpatana	ICANN
AT-LARGE ADVISORY COMMITTEE	Staff@atlarge	ALAC

Individuals:		
Name	Affiliation (if provided)	Initials
Julius Kirimi	AFRALO	JK

Section 3: Summary of Submissions

General Comments

TWNIC is in general support of the proposed policy, and specifically learning from insights and experience from the Fast Track Process and take these lessons into account in the proposed policy.

In the view of JK the report is excellent but more input is needed to amplify and cover more specific areas to avoid gaps

The ALAC and At-Large community expressed their support for the proposed policy. Attention is drawn to the ICANN Board’s request to the ccNSO and GNSO to develop a consistent solution for handling both variant IDNccTLDs and variant IDNgTLDs. This is considered important to ensure consistent implementation and to maintain a consistent user experience.

Specific Comments

TWNIC supports the proposed transitional arrangement that all IDNccTLD strings that were validated under the Fast Track will be deemed to be validated under the proposed policy, and hence that the agreements between an (IDN)ccTLD Manager and ICANN are “grandfathered-in” under the policy after it replaces the Fast Track Process.

JK suggested some potential grammatical changes and include Verification as concept as validation and verification are inseparable.

ICANN comment on limitation of delegation of variants (section 6.2.3 of Initial Report)– ICANN recognizes that limitation of delegation of variants was extensively discussed by the ccPD4 WG, however it notes that by introducing the designated language requirement for a variant of the string as requirement for delegation of the variant string the usability of variant TLDs for some script communities could be limited. ICANN suggested the following text: *Allocatable Variants of the selected IDN ccTLD string that are Meaningful Representations of the name of the Territory which are not in the designated language eligible for application in section 6.2.3 Limitation of delegation of variants.*”

ICANN comment on scope of string similarity review (section 7.2.3.A) – ICANN raised that the scope of the string similarity review on the Request Side may not fully address security issues and is not consistent with the GNSO IDN EPDP. ICANN proposes that the Similarity Evaluation Panel “*should determine which additional variants of the basic set of strings should be included in the **Request Side**, factoring in: The likelihood of misconnection, Scalability, and Unforeseen and/or unwanted side effects. In its report, the Panel must provide its reasoning for its determination, whether or not to include additional variants of the basic set of strings included in the request side.*”

ICANN comment concerning confidentiality requirement during processing of requests (Section 15.1) – ICANN requests guidance on on sharing data of requested ccTLDs and applied- for gTLDs for the string similarity evaluation processes for IDN ccTLDs and gTLDs. There is a possibility that an IDN ccTLD string is requested during a gTLD round. In this case, the requested IDN ccTLD string and the applied-for gTLD strings will need to be compared for string similarity by the String Similarity Review Panels as part of both the gTLD and the ccTLD application evaluation.

ICANN comment on precedence of similar IDNccTLD and gTLD recommendations – ICANN requests guidance on how to act in situations where a requested IDN ccTLD string is requested during a gTLD round and the requested IDN ccTLD string and the applied-for gTLD strings are found to be similar by IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel. The IDNccPDP4 is suggested to consider the related details in the IDNccTLD Fast Track Process (section 5.5) and/or to be discussed with the GNSO IDN EPDP WG.

ICANN comment on introducing the Risk Treatment Appraisal (Section 8.8) – ICANN notes that by proposing the Risk Treatment Appraisal Procedure IDNccTLD strings that are confusable in the uppercase form are introduced into the root zone.

Section 4: Analysis of Submissions

The IDNccPDP4 Working Group will analyze the comments received.

Section 5: Next Steps

After analyses of the comments, the Working Group will update its Initial Report in areas it deems necessary taking into account the comments received. The Analyses of the comments received will be appended to the Final Report.