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# Public Comment Summary Report

## Preliminary Issue Report on Latin Script Diacritics

**Open for Submissions Date:**

Thursday, 18 July 2024

**Closed for Submissions Date:**

Tuesday, 27 August 2024

**Summary Report Due Date:**

Tuesday, 10 September 2024

**Category:** Policy

**Requester:** Generic Names Supporting Organization (GNSO), ICANN org

**ICANN org Contact(s):** [steve.chan@icann.org](mailto:steve.chan@icann.org), [john.emery@icann.org](mailto:john.emery@icann.org)

**Open Proceeding Link:** <https://www.icann.org/en/public-comment/proceeding/preliminary-issue-report-on-latin-script-diacritics-18-07-2024>

**Outcome:**

In total, forty-one (41) Public Comments were submitted on the Preliminary Issue Report on Latin Script Diacritics by a range of stakeholders across the community. Thirty-seven (37) of the total Public Comments were in support of the initiation of a policy development process (PDP) for Latin Script Diacritics. The comments stated that this was an important step toward inclusivity and equality in a multilingual Internet and would align with the broader goal of Universal Acceptance (UA). Two (2) comments were mixed, indicating that while this represents an important step for inclusivity, it could negatively impact end users, create confusion, and make it difficult to distinguish between authentic and malicious websites. One (1) comment was against initiating a PDP on this topic on the basis of maintaining a user-friendly and secure Internet. Finally, one (1) comment was deemed out of scope as it was a word choice issue that goes against the common parlance on this topic.

ICANN staff would like to thank the community for engaging so deeply and thoroughly on this topic through the Public Comment Process. The community input on Latin Script Diacritics will be considered by the staff in preparing the Final Issue Report for GNSO Council consideration and determining the next steps. All comments will be shared with the GNSO Council.

### Section 1: What We Received Input On

The Preliminary Issue Report on Latin Script Diacritics examined a single issue: the circumstance where a base ASCII generic top-level domain (gTLD) and the Latin script diacritic version of the gTLD are not variants of each other, and where currently no mechanism exists

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that allows a single registry operator to simultaneously operate both gTLDs. The report provided additional background about the issue, including factors that might be appropriate for considering the scope of the issue or that might aid in a PDP, and an assessment as to whether this issue is within scope of the ICANN policy process and the GNSO. The report also included a draft PDP charter.

## Section 2: Submissions

**Organizations and Groups:**

<b>Name</b>	<b>Submitted by</b>	<b>Initials</b>
Brazilian Association of Software Companies	Mark William Datysgeld	ABES
Point Québec	Claude Menard	
Puntu Corsica	Bertrand Louveau	
Point Swiss	Stéphane Bondallaz	
dotkoeln GmbH, punkt.wien GmbH	Ronald Schwaerzler	
dotBERLIN GmbH Co. KG	Dirk Krischenowski	
Association www.bzh	David Lesvenan	
.SX Registry SA	Normand Fortier	
ISOC Québec Chapter	Pierre-Jean Darres	
Permanent Mission to the UN Geneva and Vienna of the Organisation internationale de la Francophonie (OIF)	Antoine Barbry	
DomainePlus.com	Steve Pesant	
Likuid.com	Yves Auger	
Association francophone des propriétaires de boisés de L'est de l'Ontario	Jean Saint-Pierre	
PUNTUEUS Foundation (.EUS Registry)	Josu Waliño	
Afnic	Marianne Georgelin	
FRLregistry (.frl)	Siemen Roorda	
Kaleidos Agence Web	Jonathan Truchon	
Innovation, Science and Economic Development Canada / Innovation, Sciences et Développement économique Canada	David Bedard	
Fundació puntCAT	Nacho Amadoz	
At-Large Advisory Committee	Policy staff in support of the At-Large Community	ALAC
CORE ASSOCIATION / COREHUB SRLU	Marta Baylina	
PlanetHoster	Mina Shenouda	
GeoTLD Group	GeoTLD Group	
CIRA	Byron Holland	
WHC Online Solutions Inc. (whc.ca)	Frank Michlick	
Indigo Green in Sint Maarten	Rene Lepine	

**Individuals:**

Name	Affiliation (if provided)	Initials
Jim DeLaHunt		
Gbééré Achille Eye		
Nikesh B Simmandree		
Jacques Latour		
Martin Joyal		
Gilles Lemieux		
Christelle Vaval	LACRALO	
Benoît Melançon		
Bill Jouris	At Large	
Glenn McKnight	NARALO	
Marc-Antoine Gagnon		
Louis-Philippe Bellier		
Bibi Rookayya Gulmahamed	ISOC Québec	
Raymond Selorm Mamattah		

## Section 2a: Late Submissions

At the discretion of staff, one (1) late submission from the Business Constituency (BC) was accepted for Public Comment consideration. It is available on the [dedicated webpage](#) and appended to this report.

**Organizations and Groups:**

Name	Submitted by	Initials
Business Constituency	Steve DelBianco	BC

## Section 3: Summary of Submissions

The GNSO and ICANN received a total of forty-one (41) submissions to this Public Comment proceeding on Latin Script Diacritics, which can be summarized as follows:

- Support the initiation of a PDP on Latin Script Diacritics (37 respondents)
  - Diacritics are a fundamental part of many languages and especially for French speakers and the Francophone countries.
  - Diacritics are fundamental for an inclusive Internet in Latin America.
  - Essential for inclusivity and equality in the digital space.
  - Crucial to progress toward UA and a multilingual Internet.
  - Enhances user experience and simplifies navigation.

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- Mixed support with a strong caution (2 respondents)
    - An important step toward an inclusive Internet.
    - Convenient and less confusing for domain names and registrants alike.
    - Risks associated with new users unable to distinguish between malicious and authentic websites with minor differences in script.
    - Risks user confusion with long-established simplified Latin script.
  - Against the initiation of a PDP on Latin Script Diacritics (1 respondent)
    - Allowing domain names with similar scripts can lead to confusion, especially for nontechnical users.
    - Similar domain names increase the risk of phishing and social engineering attacks.
    - Disallowing similar script domain names is crucial for maintaining a safe and user-friendly Internet.
  - Out of scope on word choice in the Preliminary Issue Report (1 respondent)
    - Suggested use of terms other than variant and nonvariant.

## Section 4: Analysis of Submissions

Ultimately, the consensus view from the Public Comment proceedings was that the Preliminary Issue Report on Latin Script Diacritics captures the scope of the issue adequately and that a PDP should be initiated. Many of the substantive comments in support of the Preliminary Initial Report, which note the importance of the value of the subject matter for UA and a multilingual Internet, will serve as inputs to the GNSO Council in determining whether to initiate a PDP. The caution raised by the Public Comment about possible end user confusion and the security implications for the use of Latin Script Diacritics will be conveyed to the Council to consider in determining whether it should initiate a PDP. Additionally, if the Council elects to initiate a PDP, these potential risks will be shared with the PDP Working Group for mitigation, to the extent possible, in any resulting policy recommendations.

ICANN staff will take into consideration minor linguistic issues raised by some Public Comment groups in its Final Issue Report to be considered by the GNSO Council. The consensus among the comments of the desire to initiate a PDP on this topic, as well as potential risks, will be shared with the Council for its consideration in determining whether to initiate a PDP on Latin Script Diacritics.

## Section 5: Next Steps

ICANN staff will issue its Final Issue Report on Latin Script Diacritics to the GNSO Council in consideration of next steps toward a PDP based on Public Comment feedback.

Preliminary Issue Report on Latin Script Diacritics  
27-Aug-2024  
Comment of the ICANN Business Constituency (BC)

### Overview

The omission of Latin diacritics in the DNS has been a workaround inherited from historical ASCII limitations and does not signify an accurate or preferred representation of words by the involved linguistic communities. Adopting rules that reflect the advancements in Universal Acceptance in the past decade acknowledges the priority the ICANN community has consensually agreed upon to increase linguistic diversity on the Internet.

The Latin script presents unique challenges that have remained unaddressed since the previous round of new GTLDs and preempting the repetition of conflicts around the Latin script is a task that the GNSO needs to undertake with priority in order for these rules to integrate with the process of the upcoming round of new GTLDs and become part of it as soon as possible.

Similar issues have been addressed in the context of IDN ccTLDs, such as the case of .eu and .eu. ICANN developed an exception procedure that allowed for the simultaneous management of these visually similar but distinct labels by the same registry operator. Similar solutions need to be found for GTLDs, as the underlying technology and motives are the same.

### Expectations

This comment advocates for the ability for applicants to propose and manage TLD pairs in ASCII and IDN/diacritic versions, allowing them to be controlled as unit by the same operator, under specific conditions set by the community that address potential user confusion.

This should take place within the context of a tightly focused PDP with limited scope and the clear goal of addressing the ASCII and IDN overlaps that take place in some instances where diacritics are used in the Latin alphabet. No other asks/issues should be bundled with the PDP, and it should follow a straight path aiming for clear community consensus.

We find the outline provided by the Issue Report to be sufficient and to set adequate expectations around this PDP and would like to encourage the swift establishment of the processes required for this matter to advance.

Our expectation is that if both the ASCII and IDN strings are applied-for strings, they will not end up placed into a string contention set with each other. Instead, the unique requirements of this use case need to be acknowledged and understood within proper context.

Moreover, it will be beneficial if these two strings co-exist and be treated as a parent (ASCII) and child (variant) relationship, wherein domain registration in the parent be automatically replicated in the child as a derivative option with the same registrant. There will be no need to create the child registration utilizing "EPP-create" transaction hence the registry / registrar therefore should not charge additional fee to the registrant.

## Practical examples

In Brazilian Portuguese, there are a variety of cases that exemplify the two different ways in which the issue at hand can affect GTLDs, of which we will present two below:

**Interchangeable:** “.saopaulo” and “.sãopaulo” can be both used to represent the Brazilian city of São Paulo and this is easily understood by people who make use of Latin-based languages, without the potential for confusion. This, in practice, is the same issue presented in the leading case that affects this PDP, which is that of “.quebec” and “.québec”.

**Non-interchangeable:** “.maca” (stretcher)” and “.maçã” (apple). In this case, the ASCII version, “maca” corresponds directly to the word utilized for stretchers, making into a TLD suitable for medicine or sports. Meanwhile, it is possible to make use of the same base characters, but with diacritics added, to create a completely different word that stands for the fruit apple. In this case, there is no exchangeability and the coexistence of both TLDs as separate and distinct makes sense.

This comment was drafted by Mark Datysgeld and Vivek Goyal.

It was approved in accord with our charter.