

Public Comment Summary Report

Latin Script Diacritics PDP Initial Report

Open for Submissions Date:
Monday, 12 January 2026

Closed for Submissions Date:
Monday, 23 February 2026

Summary Report Due Date:
Monday, 09 March 2026

Category: Policy

Requester: Generic Names Supporting Organization (GNSO)

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Open Proceeding Link:
<https://www.icann.org/en/public-comment/proceeding/latin-script-diacritics-pdp-initial-report-12-01-2026>

Outcome:

The Latin Script Diacritics Policy Development Process (PDP) Working Group (WG) (hereafter “LD PDP WG”) received a total of sixteen (16) Public Comments from a broad range of stakeholders across the community. All its Preliminary Outputs – fifty-four (54) Preliminary Recommendations and Implementation Guidance in total – attracted feedback, both substantive and nonsubstantive. Among these, twenty-nine (29) Outputs received substantive concerns. Overall, commenters recognized the effort of this PDP in addressing the identified policy gap in a manner which aligned with Domain Name System (DNS) stability, security, and end user trust. They commended the measured approach taken, noting that it appropriately maintained a focused and narrow scope. However, some commenters expressed concerns that the limited set of characters following the Unicode Table definition and the requirement of a base ASCII generic top-level domain (gTLD) could unintentionally exclude certain characters, introduce challenges, and create user confusion. Others noted that the arbitrariness of an ASCII/Latin diacritic gTLD set and/or an ASCII/Latin diacritic domain set could adversely affect predictability, consistency, and transparency for registrants and end users. Nevertheless, the proposal for common management under the same operator, thus adhering to the same entity principle, received support from a majority of commenters.

The comments received will enable the LD PDP WG to reassess any issues they may have missed or not covered during their preliminary deliberations and help improve the language to develop the Final Report. Through the Public Comment Review process, the LD PDP WG will conduct a thorough review of all the comments received and consider whether any revisions need to be made to the Preliminary Outputs.

Section 1: What We Received Input On

The LD PDP WG sought input on its 54 Preliminary Outputs (43 Preliminary Recommendations and 11 Implementation Guidance) included in its Initial Report, which examined scenarios involving a base ASCII gTLD and its corresponding Latin diacritic gTLD(s) that are not variants of each other, aiming to establish an appropriate mechanism to allow a single registry operator to simultaneously operate both gTLDs.

Specifically, the Initial Report and its Preliminary Outputs referred to existing work – including the country code top-level domain (ccTLD) Fast Track Process, Subsequent Procedures (SubPro) PDP Final Report, and the Expedited Policy Development Process on IDNs (EPDP-IDNs) Phase 1 and Phase 2 – to identify any transferable solutions. Accordingly, the WG requested feedback on the approach it adopted and whether any transferable items may have been overlooked.

As the first PDP chartered to conduct the Global Public Interest (GPI) analysis and Human Rights Impact Assessment (HRIA), as well as assess the potential impact its recommendations may have on ICANN's existing Consensus Policies, the WG also sought feedback on the approach it adopted.

In short, the Public Comment proceeding was presented with a series of structured questions – including each Charter question with Preliminary Outputs, the Charter questions with no Outputs, GPI/HRIA, Glossary, Stress Test – while also providing an opportunity for respondents to provide general comments. When submitting the responses, the commenters were also asked to include detailed rationales to support further analyses of the relevant issues.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Brazilian Association of Software Companies (ABES)	Mark William Datysgeld	
Internet Society of Ontario Chapter	Glenn McKnight	
ICANN org	Ariel Liang	
ISOC Québec (Internet Society Canada Québec Chapter)	Pierre-Jean Darres	
Registries Stakeholder Group (RySG)	N/A	
Intellectual Property Constituency (IPC)	Margaret Milam	
CORE Association	Amadeu Abril	
ISOC Norway	Tom Fredrik Blenning	
At-Large Advisory Committee (ALAC)	Policy staff in support of the At-Large Community	
Registrar Stakeholder Group (RrSG)	Sarah Wyld	

Individuals:

Name	Affiliation (if provided)	Initials
Diksha Neeladoo B. Simmandree	N/A	
Jorge Carlos Canto Esquivel	N/A	
Nitin Walia	N/A	
Kyionna Blaylock	N/A	
Werner Staub	N/A	

Section 2a: Late Submissions

At the discretion of Staff, one (1) late submission from the Non-Commercial Stakeholder Group (NCSG) was accepted for Public Comment consideration. It is available on the LD PDP WG [wiki page](#) and appended to this report.

In total, the LD PDP Initial Report received sixteen (16) Public Comments from a broad range of stakeholders across the community.

Section 3: Summary of Submissions

To facilitate the LD PDP WG's review of the Public Comment submissions, the GNSO Support Staff developed a Public Comment Review Tool that provides a high-level analysis of the views expressed on the Initial Report, together with the detailed submissions from each contributor. All contributions received and the Public Comment Review Tool are available for review on the [dedicated webpage](#).

Section 4: Analysis of Submissions

The LD PDP WG is responsible for the review and analysis of submissions, and they will be reviewing all submissions via the [Public Comment Review Tool](#) during the WG Meetings through deliberations. Please note that, at the time of the publication of this report, the LD PDP WG will not have initiated, or will have just begun, its review and deliberations on the Public Comment submissions.

Against this backdrop, and in line with the structure of the Guided Submission Form, the Public Comment Review Tool categorized comments from each contributor per each Preliminary Output; they were largely divided into substantive (those responses that required significant change to the outputs OR did not support the outputs) and nonsubstantive (those responses that supported the outputs as written OR supported intent with wording change) comments. Feedback on those Charter questions without outputs, GPI/HRIA analyses, glossary, and stress test sections, as well as general comments were sorted separately.

In organizing the Public Comment submissions, certain themes emerged more prominently, with comments expressing concerns, requesting consideration, or proposing alternative language, suggesting where greater focus may be needed in the LD PDP WG's subsequent review of Outputs.

The most substantial feedback addressed the scope of work and the definition of the ASCII/Latin diacritic gTLD sets and/or ASCII/Latin diacritic domain sets (*[focused on Preliminary Recommendations 1 and 39](#)*). Additional feedback addressed issues related to application and contractual requirements, including fees (*[Topics 3 and 4](#)*) and second-level rules (*[Preliminary Recommendations 39–41](#)*). Feedback also touched on outreach to promote a better understanding of the rules and their faithful implementation in alignment with the LD PDP WG's intent and consistent with the outcomes of EPDP-IDNs (*[Preliminary Recommendations 50–54](#)*). Across these areas, commenters generally sought clarifications, justifications, and consideration of potential additional requirements or safeguards, to ensure that the proposed rules function as intended, without introducing confusion or inconsistency. At the same time, many viewed the report as appropriately focused, coherent, and aligned with the existing IDN-related policy work.

The community also acknowledged the LD PDP WG's initiative in undertaking the GPI and HRIA analyses, noting that this effort establishes a foundation for future work. While contributors commended the depth and rigor of the analysis, they also offered guidance for subsequent efforts. As the first PDP to integrate human rights considerations into ICANN's policy development processes, this effort was seen as both a meaningful achievement and a learning opportunity, with feedback aimed at strengthening similar initiatives going forward. The LD PDP was particularly commended for its commitment to frame its work within a human rights context.

The LD PDP WG will carefully consider all submissions on all outputs, including all the general comments, during the course of its Public Comment review. As such, the contents in the [Public Comment Review Tool](#) can be expected to be updated over time.

Section 5: Next Steps

The LD PDP WG will commence its review of the Public Comments at the ICANN85 Community Forum in Mumbai, India (March 2026). Following the review and analysis of the Public Comments received for the Initial Report, the LD PDP WG will consider whether any revisions to its Preliminary Outputs are warranted. The Final Report will be published for GNSO Council's consideration after a formal Consensus Call on all proposed Final Outputs.

NCSG PUBLIC COMMENT

Re: *Latin Script Diacritics PDP Initial report*

Submitted by: Non-Commercial Stakeholder Group (NCSG) | **Date:** *[23 Feb 2026]*

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end-users in formulating the Domain Name System policy within the Generic Names Supporting Organisation (GNSO). We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

Gratitude

NCSG thanks ICANN for the opportunity to submit comments on this important matter. We appreciate the efforts made to engage the broader Internet community in this process and the commitment to transparent, inclusive, and bottom-up policy development.

Introduction

Abstract

NCSG Position and Arguments

NCSG offers the following comments:

1. Character set limitation

Preliminary Recommendations 1.1 and 1.2 limit allowed characters to Unicode definition of diacritics. This is unnecessarily restrictive. The original, linguistic definition is alluded to in footnote 1 on page 3, but the significant difference between the two is not explained anywhere, and use of the Unicode definition is justified only by expediency, lack of time.

The Unicode criteria of decomposability is relevant here only for determining the corresponding ASCII character. But that is also trivial for all non-decomposable characters of the form "LATIN SMALL LETTER <x> WITH STROKE" or "... WITH

HOOK” or “... WITH TAIL”, where <x> is an ASCII character. Indeed most of them are diacritical characters in the linguistic sense.

Same goes for certain other characters that are obvious variations of ASCII characters, like “LATIN SMALL LETTER U BAR”, “LATIN SMALL LETTER OPEN E”. “LATIN SMALL LETTER TURNED E” and “LATIN SMALL LETTER ENG”.

Nothing at all in the policy would have to be changed by including such Latin extensions that are visually confusable with single ASCII characters even though they aren’t decomposable in Unicode.

In addition, “LATIN SMALL LETTER AE” and “LATIN SMALL LIGATURE OE” could be included even though their ASCII counterparts would be two characters: string level confusability would still be the similar.

A simple rule would be to include all Latin extensions that are in RZ-LGR and have an obvious confusable ASCII counterpart.

Including those characters would avoid discriminating against many languages for obscure reasons in Unicode terminology that aren’t really relevant for DNS.

2. Requirement of base ASCII gTLD

Preliminary recommendation 1.4 requirement that base ASCII gTLD must exist is poorly justified. Possible confusion between two Latin diacritic gTLDs would be just as great with or without a common base ASCII gTLD. Allowing them without base ASCII version would, however, require significant number of changes in the text, and it would only help to reduce costs in certain improbable business cases, so it’s probably not worth doing at this time. In the future it would be good, however, to move away from treating ASCII as a special case.

3. Integration with the new gTLD applicant guidebook.

Ideally, the result of LD-PDP should be included in the new gTLD applicant guidebook, and then the new applicant could include the Latin Script Diacritic character(s) in their application. Since the new guidebook already launched, we suggest the result of LD-PDP also explains how the applicants could integrate the gTLD application, as well as the Latin Script Diacritic in the most simple manners, both in time and expenses. The seamless and simple system for both applications could encourage the related stakeholders to take advantage of these new programs.

Conclusion

NCSG appreciates the opportunity to contribute to this process and urges ICANN to give full consideration to the views expressed herein. We remain committed to constructive engagement in support of ICANN's mission and the open, secure, and stable Internet.

NCSG is also committed to supporting human rights and in particular rights of minorities and minority languages. Therefore we would like to treat similarly all characters that could be included without reasons that actually affect DNS operation. We would also like to move towards treating all languages equally and away from historical ASCII-centric rules.

Respectfully submitted,

Non-Commercial Stakeholder Group (NCSG)

Generic Names Supporting Organisation (GNSO), ICANN

Contact: [NCSG Chair / Policy Committee Chair name and email]

Our NCSG Comment on the LD PDP HRIA:  [LD PDP] HRIA Checklist for LD PDP

Introduction

The ICANN Noncommercial Stakeholder Group (NCSG) welcomes the opportunity to comment on the Human Rights Impact Assessment (HRIA) developed by the Latin Diacritics Policy Development Process Working Group (LD PDP WG). We commend the Working Group for undertaking this analysis and for its commitment to situating the LD PDP's recommendations within a human rights framework.

The NCSG has long advocated for the integration of human rights considerations into ICANN's policy development processes, and we view the LD PDP HRIA as a meaningful step in that direction. Our comments address each of the five issue areas assessed in the HRIA — Diversity, Participation, Due Process, Accountability, and Transparency — identifying what has been done well and offering constructive recommendations for future iterations.

Overall, we find that the HRIA's three core framing questions — Necessity, proportionality and legitimacy — are particularly well-suited for PDP HRIAs and a part of the framework, and that the treatment of all five issue areas is substantive and thoughtful. Our recommendations below are intended to strengthen this work and to encourage ICANN to institutionalize HRIAs as a standard component of all future PDPs.

1. Diversity

What was done well

The HRIA correctly identifies the LD PDP as fundamentally a diversity and inclusion initiative. The framing question — “Do the LD policy recommendations allow for a diverse, inclusive, and a multilingual Internet?” — is the right question to anchor this analysis. The assessment’s finding of high positive impact and low negative impact on diversity is well-supported: the LD exception process directly enables communities using Latin diacritic scripts to participate in the DNS in a way that was previously structurally foreclosed.

We particularly commend the recognition that Topic 3 (Application Process) and Topic 8 (Domain Name Lifecycle) contain the operational levers most likely to affect whether the diversity goals of this policy are actually realized. The HRIA also appropriately notes the connection between diversity and Universal Acceptance, which is critical for non-ASCII scripts.

Areas for improvement

The HRIA acknowledges that certain characters — such as the Norwegian ø and similar non-diacritic Latin script characters — fall outside the scope of this PDP and may therefore experience a negative diversity impact. While the WG notes this will be addressed in future work, we recommend that the HRIA be more specific about what a concrete pathway for those communities looks like, and what timeframe might be expected. Vague references to “future efforts” can become a permanent deferral if not anchored to a follow-on process.

We also encourage future HRIAs to disaggregate the “impacted groups” category more precisely. The current formulation — “Registries, Registrars, and Registrants, as well as end-users in the Latin script cultures” — does not distinguish between well-resourced commercial registries and small community-based registries in underserved regions, whose diversity interests and capacity to benefit from these policies may differ substantially.

2. Participation

What was done well

The Participation section asks two distinct but complementary questions: whether the recommendations support free expression through effective participation, and whether personal data is appropriately protected. The HRIA handles both dimensions with care. The analysis of Topic 8 in particular — covering dispute resolution, inter-registrar transfers, and the requirement for appropriate information disclosure “subject to privacy considerations” — reflects a mature understanding that participation and privacy are interdependent rights, not competing ones.

The HRIA also deserves credit for honestly naming the structural barriers to participation: smaller registries and underserved communities face financial obstacles and may lack the legal or technical capacity to engage effectively with ICANN’s complex processes. The acknowledgment that the Applicant Support Program (ASP) exists but may be insufficient is important and should be highlighted, not buried.

Areas for improvement

The HRIA identifies the risk that “complex application, contract, and domain name management processes” may discourage participation, but stops short of recommending mitigation measures. Future iterations should include concrete procedural recommendations when negative impact scenarios are identified — for instance, calling for plain-language summaries of processes in multiple languages, dedicated outreach to underrepresented registry communities, or fee waiver provisions beyond ASP.

On data privacy: the HRIA notes that “privacy by design” principles from the New Round are expected to carry over to the LD PDP, but this should be made explicit rather than assumed. We recommend that future HRIAs include a specific recommendation that data minimization and privacy be expressly incorporated into the LD PDP’s implementation guidance, rather than inherited by implication. Moreover, the HRIA says: there could be some minor cybersecurity risks including data privacy violations. But it does not explain how the impact was assessed as minor.

3. Due Process

What was done well

The Due Process section is among the strongest in the HRIA. The framing question — whether the policy provides for appeal when an application is rejected — is direct and answerable. The HRIA’s analysis of Topics 3, 5, and 8 effectively maps the mechanisms available: extended evaluation, voluntary removal, and dispute resolution procedures all represent meaningful due process protections.

The recognition that “implementing the rules of engagement is key for the adequate understanding of the process” for less-privileged communities is an important observation that aligns with the NCSG’s longstanding position that procedural rights are only meaningful if they are accessible. Formal rights without accessible pathways are rights in name only.

Areas for improvement

The HRIA identifies affordability of legal and technical support during appeals as a significant negative impact scenario but does not mention what can be done in the future. We urge the WG to include an explicit recommendation that ICANN assess whether the costs of appeals and extended evaluations are prohibitive for small or underserved applicants, and to consider whether legal aid or pro bono support mechanisms should be established.

Additionally, the HRIA could be strengthened by addressing the independence and impartiality of the appeals process itself. Procedural due process requires not only access to appeal, but confidence that the reviewing body is independent of the original decision-makers. Future HRIAs should include a question specifically addressing the structural independence of dispute and appeals mechanisms.

4. Accountability

What was done well

The Accountability section takes a broad view of what accountability means in the LD PDP context, covering operational alignment with ICANN’s existing procedures, reasonable timeframes, interim measures, and public awareness. The observation that this PDP was designed to be viable across multiple rounds — not just the immediate Next Round — is significant from an accountability standpoint, as it signals a commitment to durable rather than ad hoc governance.

The HRIA’s analysis of Charter Question 4 as a touchstone for alignment with existing policies is also noteworthy. Embedding accountability obligations in charter questions creates a structural check that should be replicated in future PDPs.

Areas for improvement

The HRIA acknowledges that whether the proposed timeframes are “reasonable or appropriate can only be assessed once the policy is implemented.” While this is technically accurate, it represents a missed opportunity. Future HRIAs could include a recommendation for a structured post-implementation review — with defined criteria and timelines — so that accountability obligations do not dissolve at the point of adoption. We recommend that the LD PDP Final Report include a recommendation to do a light HRIA review no later than 18 months following first implementation.

On outreach: the risk that “outreach efforts may not be sufficient for less privileged underserved communities” is identified but not operationalized. The HRIA should include a recommendation that ICANN publish measurable outreach targets — including geographic and linguistic reach — as part of the implementation plan, so that accountability for outreach can be assessed against objective benchmarks.

5. Transparency

What was done well

Transparency is the issue area where the LD PDP HRIA is most comprehensive. The assessment correctly notes that transparency was not an afterthought but was embedded throughout the WG’s deliberative process: from transparent application criteria and fee structures (Topics 3–4), to public reporting on delegation and removal (Topic 5), to information disclosure requirements tied to the domain name lifecycle (Topic 8). The HRIA’s framing of transparency as both an intrinsic value and an enabling condition for the other rights assessed is analytically sound.

Areas for improvement

The HRIA identifies three specific implementation risks: publication delays, uneven distribution of technical handling reports, and evaluation results that may not be fully transparent throughout the process. These are real and foreseeable risks. However, like the other issue areas, the HRIA stops at naming the risk.

We recommend that the HRIA include a recommendation on explicit transparency benchmarks: publication timelines for evaluation results, a requirement that technical reports be made available in all ICANN official languages, and a clear mechanism for the public to flag when transparency obligations are not being met. Transparency obligations without enforcement pathways risk becoming aspirational rather than operational.

6. Cross-Cutting Recommendations for Future HRIAs

Beyond the specific issue areas, the NCSG Policy Committee offers the following cross-cutting observations to strengthen the HRIA methodology for future PDPs:

Proactive, not retroactive, integration: The LD PDP HRIA was developed alongside the substantive policy work rather than after the fact. This is the correct approach and should be formalized as a requirement for all future PDPs. HRIAs conducted after policy development is complete have limited utility; they can document impact but cannot shape it.

Operationalizing mitigation: Across all five issue areas, the HRIA identifies negative impact scenarios with accuracy but rarely translates them into concrete mitigation recommendations.

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Future iterations should adopt a standard structure that pairs each identified risk with at least one actionable mitigation measure, with a designated owner and timeframe.

Disaggregating impacted communities: The uniform descriptor “Registries, Registrars, and Registrants, as well as end-users in the Latin script cultures” does not capture meaningful variation in capacity, resources, and vulnerability across these groups. Future HRIAs should apply an intersectional lens, distinguishing, at minimum, between commercial and community registries, and between communities with established DNS presence and those the policy is designed to bring in for the first time.

Post-implementation review: All five issue areas note that the real test of the policy’s human rights impact will come at implementation. We strongly recommend that the LD PDP Final Report include a commitment to a formal post-implementation HRIA review, with a defined scope, independent assessors, and public reporting.

Formalizing HRIA as a GNSO standard: The LD PDP HRIA represents a significant advancement in ICANN’s human rights practice. The NCSG recommends that the GNSO Council formally adopt HRIA as a required deliverable for all future PDPs, using the LD PDP methodology as a template while continuing to refine it through practice.

Conclusion

The NCSG Policy Committee strongly supports the LD PDP HRIA and commends the Working Group and ICANN staff for the quality and depth of its analysis. The responses and impact analysis include honest acknowledgment of implementation risks reflects the kind of intellectual integrity that makes HRIAs useful rather than merely performative.

Our recommendations are offered to make the future process better.

We thank the LD PDP Working Group and ICANN staff for its work and look forward to continued engagement on implementation.