

# Public Comment Summary Report

## Proposed Next Round Base gTLD Registry Agreement-Spec 14 (Variant TLDs)

**Open for Submissions Date:**  
Wednesday, 10 December 2025

**Closed for Submissions Date:**  
Tuesday, 27 January 2026

**Summary Report Due Date:**  
Tuesday, 12 February 2026

**Category:** Policy

**Requester:** ICANN org

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**Open Proceeding Link:**  
<https://www.icann.org/en/public-comment/proceeding/proposed-next-round-base-gtld-registry-agreement-spec-14-variant-tlds-04-12-2025>

**Outcome:**  
In total, five Public Comments were submitted by stakeholders from across the community on the proposed Specification 14, which is included in the proposed 2026 Base gTLD Registry Agreement (2026 Base RA) for Variant TLDs.

Commenters were requested to review the changes against the draft Specification 14 published during the second [Public Comment](#) proceeding on the 2026 Base RA and provide additional feedback. They were also asked to consider the updates to Specification 14 as part of implementing IDN EPDP Phase 1 Recommendations 7.4 and 7.5, as [approved](#) by the ICANN Board.

All Public Comments received were reviewed and considered by ICANN org.

### Section 1: What We Received Input On

As part of the New Generic Top-Level Domains (gTLD) Program: 2026 Round, ICANN is preparing the 2026 Base gTLD Registry Agreement (2026 Base RA), which outlines the rights and obligations of new gTLD registry operators. Once the ICANN Board approves the Base RA for the 2026 Round of the New gTLD Program, it will serve as the form of contractual document between successful new gTLD applicants and ICANN. Note that this draft is not final and is subject to ICANN Board consideration and approval.

ICANN opened a Public Comment proceeding on Specification 14 (Variant gTLDs) of the 2026 Base RA to seek input from the community, including potential 2026 new gTLD applicants.

Specification 14 is based on the outputs of the [Final Report on the new gTLD Subsequent Procedures Policy Development Process](#) (SubPro Final Report) and [Phase 1 Final Report on the Internationalized Domain Names Expedited Policy Development Process](#) (IDN EPDP Phase 1), the ICANN Consensus Policy that introduces variant gTLDs. Specification 14 was part of the first two Public Comment proceedings on the 2026 Base RA, with Section 2.13 of Specification 14 bracketed pending Board consideration of Recommendations 7.4 and 7.5 from the IDN EPDP Phase 1 Final Report.

This proposed updated draft of Specification 14 follows the ICANN Board [resolution](#) on IDN EPDP Phase 1 Recommendations 7.4 and 7.5, directing ICANN org to incorporate the remaining two recommendations into the existing implementation work, which includes the 2026 Base RA and specifically, updates to Specification 14. Updates to Specification 14 included:

- **Section 2.13: Fees** implementing IDN EPDP Phase 1 Recommendations 7.4 and 7.5 regarding fixed fees, transactional fees, and RPM Access Fees;
- **Section 2.14: Reservations for Registry Operations** following the changes proposed in Section 3.2 of Specification 5 and how that change applies to variant TLDs;
- **Section 2.16: Amendments and Waivers** outlining that the registry operator shall have one (1) vote for the variant TLD set.

This Public Comment proceeding presented the incremental changes to Specification 14 as compared to the second [Public Comment](#) of the 2026 Base RA for additional feedback.

## Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Noncommercial Stakeholder Group	Farzaneh Badiei	NCSG
Registries Stakeholder Group		RySG

Individuals:

Name	Affiliation (if provided)	Initials
Claude Ménard	PointQuébec	CM
Sebastian Ducos		SD
Nitin Walia		NW

## Section 3: Summary of Submissions

ICANN appreciates the time, dedication, and participation of all who contributed in this proceeding and is grateful for the timely feedback received. A summary of all comments is provided below.

In general, the comments received regarding the proposed Specification 14 support the incremental changes. NW and the RySG stated that the changes accurately implement the relevant PDP recommendations and represent substantial progress in supporting a multilingual and inclusive Internet.

NW suggested that ICANN could strengthen the registry agreement by emphasizing consistent naming conventions and Universal Acceptance-compatible practices when operators select reserved operational names across variants. Further, it should also incorporate explicit Universal Acceptance (UA) and email address internationalization (EAI) readiness expectations and establish periodic reporting or structured engagement with variant TLD registry operators to ensure policy evolution reflects operational realities and emerging UA challenges.

NW also recommended that ICANN offer additional operational guidance to applicants on managing variant TLDs and addressing unintended cross-script confusion, including illustrative examples of emergency-transition behaviors in cases where variant TLDs fail. The commenter also suggested that ICANN should enhance capacity-building, outreach, and training for new applicants, particularly in regions with high levels of IDN usage.

The NCSG acknowledged that the introduction of variant TLDs is an important step toward a more multilingual Internet, but emphasized that ICANN should consider tailoring exemptions narrowly to demonstrate that any restricted registration policies do not infringe on freedom of expression or the rights of noncommercial users. The NCSG also emphasized that ICANN should consider preventing the circumvention of public interest commitments, and maintaining a high level of transparency including with regards to registration eligibility.

The NCSG also noted the potential need to ensure predictable user experiences for users in different regions using different scripts and equitable access. The NCSG also reminded ICANN that the Registry Agreement is the primary tool for ensuring registries uphold their public interest commitments, including suggesting additional review mechanisms.

Finally, ICANN reiterates that the scope of the 2026 Base RA contractual requirements for variant TLDs was derived from the recommendations in the SubPro Final Report and the IDN EPDP Phase 1 Final Report, and is consistent with such recommendations. Should the community wish to provide additional review mechanisms of Specification 14 designations, it would follow and adhere to the community-driven policy development processes.

CM reiterated his position from the second Public Comment proceeding on the 2026 Base RA requesting that the 2026 Base RA include an additional specification as a placeholder to account for ASCII/Latin Diacritic set of TLDs, noting that the Latin Diacritics policy development process (PDP) will not be implemented in time for the publication of the 2026 Base RA and since the Latin Diacritics PDP has mirrored those of the IDN EPDP Recommendations (as CM referred to IDN “Variant” EPDP). SD expressed his agreement with the comments from CM.

## Section 4: Analysis of Submissions

As noted, ICANN org appreciates the feedback from the community and the general support of the proposed Specification 14 for Variant TLDs as part of the proposed 2026 Base RA.

Regarding the request from NW for ICANN to strengthen the registry agreement to emphasize consistent naming conventions, addressing unintended confusion, and Universal Acceptance-

compatible practices when operators select reserved operational names across variants, the 2026 Base RA reflects the appropriate contractual scope as directed by SubPro Final Report and the [IDN EPDP Phase 1 Recommendations](#). Regarding NW's request to address unintended confusion, Section 2.15 in Specification 14 addresses potential confusion by requiring that allocatable variants be allocated to the same registrant.

ICANN acknowledges the importance of achieving UA and remains dedicated to supporting the readiness of the broader ecosystem through policy, technical guidance, and stakeholder engagement. To strengthen this commitment, in 2025 ICANN launched the Universal Acceptance Expert Working Group, which will develop guidelines for ICANN org to consider in its implementation work on UA adoption, and help ensure consistent progress toward UA-readiness.

In response to NW's request to incorporate explicit UA and EAI readiness expectations and to establish periodic reporting, ICANN continues to publish regular updates on UA progress, including during ICANN meetings and through the annual [UA Readiness Report](#) for the community and applicants. ICANN encourages participation from the community, including Next Round applicants, as work continues to promote UA adoption. For more information on how to participate, refer to the [UA Day 2026 Events Schedule](#).

ICANN acknowledges the comments from the NCSG but wishes to clarify how Specification 14 works because there are no exemptions provided by Specification 14. Any registry operator that is approved to also operate Variant TLDs is required to sign onto the same contractual obligations in the 2026 Base RA, including obligations to comply with the public interest commitments set forth in Specification 11. Accordingly, any registry operator that also has a Specification 14 still needs to "operate the TLD in a transparent manner consistent with general principles of openness and non-discrimination by establishing, publishing, and adhering to clear registration policies" as required by Section 3(c) of Specification 11.

Specification 14 does not provide any exceptions or exemptions to this requirement or other requirements in the 2026 Base RA, and does not provide exemptions for Variant TLDs from Public Interest Commitment requirements, as the NCSG suggested. Rather, Specification 14 adds onto the 2026 Base RA to make sure the requirements apply to the Primary TLD and Variant TLDs individually (see Section 2.1 of Specification 14, which says, "this Agreement shall apply in full force and effect to each Primary TLD and Variant TLD(s) as though each individually had its own registry agreement) and to provide clarity on when the Primary TLD and Variant TLDs should be treated collectively as a set. (For example, Section 2.8 of Specification 14 notes that if any TLD in the TLD set triggers an emergency threshold, the entire TLD set is then subject to emergency transition).

Similarly, if a registry operator also qualifies as a .Brand TLD and signs onto Specification 13, there is an additional Section 2.17 added to Specification 14, making it clear that the Primary TLD and Variant TLDs should be treated collectively as a set when the registry operator also has a Specification 13. Otherwise, like any registry operator that does not have a Specification 13 and does not have a code of conduct exemption, a registry operator with a Specification 14 must still comply with the code of conduct set forth in Specification 9.

Regarding the NCSG's comments on user consistency and equitable access particularly, the Applicant Guidebook (AGB) does provide some requirements for applicants that speak to this concern. In Section 7.6 of the AGB, applicants must include steps they will take to minimize the operational and management complexities of the variant gTLDs and resulting variant domain

names that impact registrars, resellers, or registrants, which will be evaluated and these commitments “will form the basis of contractual requirements to be included in the applicable Registry Agreement”. Further, in relation to fee structures, ICANN notes that the cost of the domain name to registrants falls outside ICANN’s remit. End-user pricing is determined by the fee structures established by registries and registrars.

Regarding the NCSG’s comment reminding ICANN and registries that any attempt to “to arbitrarily censor or delete domain names based on non-technical content” we encourage the NCSG to review [Section 2.4](#) “Applicant Freedom of Expression” in the AGB.

In response to the request to add contractual obligations to the proposed 2026 Base RA prior to the finalization of the Latin Diacritics PDP or in advance of the ICANN Board acting on the Latin Diacritics PDP, as stated in the Public Comment Summary and Analysis [Report](#) (2 of 2), including contractual obligations before the PDP is concluded and before the ICANN Board can take action is not consistent with the GNSO Expedited Policy Development Process in [Annex-1](#) of the ICANN Bylaws. Once the PDP concludes, the policy recommendations will be forwarded to the Generic Names Supporting Organization Council for deliberation and, if approved, the PDP Recommendations and Final PDP Recommendations Report will be forwarded to the ICANN Board through a Recommendations Report to review and take action. If the Board approves the policy for implementation, ICANN will then work with the Implementation Review Team (IRT) to carry it out. ICANN cannot bypass the policy development process by adding contractual obligations in the proposed 2026 Base RA before knowing what policy may ultimately be adopted.

## Section 5: Next Steps

All Public Comments received were reviewed and carefully considered by ICANN org. ICANN org will include the proposed Specification 14 in the 2026 Base RA and submit the proposed 2026 Base RA to the ICANN Board for consideration. The anticipated review of the proposed 2026 Base RA by the ICANN Board will be in March 2026 at ICANN85.