

Report of Public Comments

Title:	Reference Label Generation Rulesets (LGRs) for the Second Level																	
Publication Date:	6 May 2015																	
Prepared By:	Sarmad Hussain																	
<table border="1"> <tr> <td colspan="2">Comment Period:</td> </tr> <tr> <td>Comment Open Date:</td> <td>10 March 2015</td> </tr> <tr> <td>Comment Close Date:</td> <td>19 April 2015</td> </tr> </table>		Comment Period:		Comment Open Date:	10 March 2015	Comment Close Date:	19 April 2015	<table border="1"> <tr> <td colspan="2" style="text-align: center;">Important Information Links</td> </tr> <tr> <td colspan="2" style="text-align: center;">Announcement</td> </tr> <tr> <td colspan="2" style="text-align: center;">Public Comment Box</td> </tr> <tr> <td colspan="2" style="text-align: center;">ViewCommentsSubmitted</td> </tr> </table>		Important Information Links		Announcement		Public Comment Box		ViewCommentsSubmitted		
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Section I: General Overview and Next Steps																		
<p>During the new gTLD program's Pre-Delegation Testing (PDT), ICANN has noted a large number of IDN table submissions. The IDN tables submitted by the new gTLD registries varied in the repertoire of characters, variant and contextual rules, and format. On the request of the community, to facilitate and improve consistency of testing and stability of registry operations of new gTLDs, ICANN intends to develop reference IDN tables in machine readable format, called Label Generation Rulesets (LGRs) for the second level, for use in PDT and the Registry Service Evaluation Process (RSEP). ICANN is suggesting a process to ensure both linguistic and technical expert input and community review of these tables being developed. The community is requested to review and provide feedback on the effectiveness of the suggested process for the development of these tables, and propose any further improvements.</p> <p>Next steps are to update the process for development based on the feedback received and then proceed with the development of the Reference Label Generation Rulesets (LGRs) for the Second Level by releasing an open Request for Proposals (RFP).</p>																		
Section II: Contributors																		
<p><i>At the time this report was prepared, a total of [number] (n) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.</i></p>																		
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KNET	Jian-Chuan Chang	KNET																
Individuals:																		

Name	Affiliation (if provided)	Initials
Meikal Mumin		MM
Hiro Hotta	Japan Registry Services	HH

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

ICANN thanks the contributors for their thoughtful comments and queries.

MM recommends adding an additional step in the procedure which specifies how these reference LGRs will be updated over time.

KNET suggests that each registry should have full control of LGRs at the second level, and differences in characters, variant, contextual rules, and format is not a problem for ICANN to address. This may be done based on a consensus on registration policy. KNET also states that if this is to be taken up, it should be done after LGR for the Root Zone has been done.

Verisign points out that creating and using LGR for second level is outside ICANN's role. Creating the bureaucracy may also hinder the communication online as it will slow down the change process in these LGRs. Further, such standards should be done through IETF. Also, as RFC 4290 is widely used, the LGR format specification should not be used. Verisign also asks for details of the request for these LGRs and the community which has requested for it. Verisign further states that LGRs will constrain the options and thus reduce competition in the marketplace. For example, some registries may choose to compete with other registries for Chinese Language registrations by supporting certain rarely used Chinese Unicode code points. Provided that these code points are valid Chinese characters, and do not create confusion, this competitive practice will serve consumers in a positive way.

HH poses multiple queries. First, if LGRs at second level may have multiple scripts and languages and if this has been incorporated into the process? Second, what is the relationship of this work to Root LGR? Third, how may the variation in IDN tables for the same language be handled? Finally, who will develop the IDN tables and what will be the role of registries in the process?

CDNC holds the view that that a unified table and rule for the second level might help to provide the unified experience for global end users. However, it should not be taken up at this time, before the root LGR is finalized. They also suggest that this should be done by consensus on registration policy among IDN TLDs.

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

The issue around the challenges with IDN Tables at the second level during Pre-Delegation Testing (PDT) and Registry Service Evaluation Process (RSEP) was raised in the meeting focused on IDNs between GNSO council and its members and the Board Variant Working Group at ICANN 50 in London, following the initial discussion on IDN related matters during the meeting between GNSO and the ICANN Board.

PDT and RSEP are part of the implementation of the policy developed for new gTLDs by the community. Every new registry must undergo PDT in accordance with the technical and operational criteria described in the Applicant Guidebook (Module 5: Transition to Delegation). For a new gTLD which offers IDNs at second level, the applicant identifies the language(s) and/or script(s) which it intends to offer and submits IDN table(s) corresponding to them, which are tested as part of the PDT. If a gTLD wants to add IDN support for additional language(s) and/or script(s) at a later stage, it does so through RSEP, and is also requested to submit corresponding IDN table(s). Though the processes requires verification of IDN Tables, the challenge in implementation has been that there have been no authoritative references available for the community, which makes the process more involved and time consuming. The current effort is to make the existing implementation process more transparent and efficient for the community. These reference LGRs will be beneficial to the community in any subsequent rounds of gTLDs as well.

The intention of the work is to simplify the existing PDT and RSEP processes. These LGRs will be openly available for reference as a recommendation but not as a stipulation. Applicants who choose to use this recommendation can go through the PDT and RSEP processes in a straightforward manner. However, deviations from these tables will also be possible. In such cases, like in the current PDT and RSEP processes, the applicant may have to provide additional information. However, such deviations are anticipated to be minimal, as the authoritative reference LGRs being developed should cover most the anticipated cases because they will be developed through an open process, involving community feedback, and incrementally updated over time. As the repertoire and rules in the IDN tables of the registries are not constrained by the reference LGRs, the latter will not impact the competition in the marketplace.

These tables are being developed in the XML specification for LGRs as it is a formal specification which is machine readable. Therefore, the IDN tables in this format will be easier to process and will promote interoperability in the longer term. ICANN is also in the process of developing an LGR tool which will allow the community to easily develop, manage and use the LGRs in this format. The LGR tool will be released in public domain with open source license for the community to use.

The recommendation of the community to develop an efficient change management process has been noted and the existing proposed process will be updated to incorporate the suggestion.

The second level LGRs may be different from the Root Zone LGR in multiple ways. For example, second level LGRs may be language dependent, whereas LGR for the Root Zone is based on scripts. This difference may have impact on both the repertoire and the rules. Further second level LGRs may

not be as conservative as the Root Zone LGR, and may contain additional code points (e.g. digits). As many of the Generation Panels are either forming or undertaking their work at this time, waiting for them to finish may delay this work. However, second level LGRs can certainly benefit from the experience of script based LGRs for the top-level being developed through the community led process at this time, and will promote more consistency across levels. For this reason, ICANN will make sure to explicitly reach out to all the active Generation Panels for feedback on relevant second level LGRs when these go through the public comment process.

The reference LGRs will be developed through a provider, selected through an open Request for Proposals (RFP). As described in the process, the provider will develop these tables based on authoritative sources, and each language table will be reviewed by experts in the relevant language/script and IDNs/DNS. The complete documentation (including the sources) and LGRs will be shared with the community and finalized based on the public feedback. The IDN tables will also document any variations which may be needed for different geographic or other contexts and may also recommend mixing scripts to address different writing systems.