Public Comment Summary Report

String Similarity Review Guidelines

Open for Submissions Date:
Wednesday, 07 February 2024

Closed for Submissions Date:
Wednesday, 10 April 2024 (Extended from Wednesday, 27 March 2024)

Summary Report Due Date:
Wednesday, 15 May 2024 (Extended from Wednesday, 17 April 2024)

Category: Technical

Requester: ICANN org

ICANN org Contact(s): pitinan.koo@icann.org

Open Proceeding Link: https://www.icann.org/en/public-comment/proceeding/string-similarity-review-guidelines-07-02-2024

Outcome:

ICANN org appreciates the comments submitted by the community on the String Similarity Review Guidelines (the "Guidelines"). During the ICANN79 meeting, ICANN org received a request to add more examples of similarity types to the Guidelines. Therefore, the updated Guidelines were posted, and the Public Comment was extended for two weeks.

ICANN org received nine comments. Three comments agree with the consideration and methodology of the Guidelines without further comments. Six comments provide additional queries or suggestions. After analyzing the comments and incorporating them as needed by ICANN org, the final version of the Guidelines will be posted on the Next Round Resource Page.

Following the ICANN Board's consideration and the completion of subsequent work on String Similarity Review, ICANN org will update the Guidelines and publish them for another Public Comment for finalization.

Section 1: What We Received Input On

In preparation for the New gTLD Program: Next Round, ICANN org developed detailed guidelines for conducting the string similarity review, which is conducted by the String Similarity Review Panel. The expanded scope of the review will include variant strings.

Feedback was requested on the String Similarity Review Guidelines, with emphasis on the proposed methodology.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee		ALAC
Business Constituency		BC
Registries Stakeholder Group		RySG

Individuals:

Name	Affiliation (if provided)	Initials
Davies Lewis	I Love Domains - United States o' America	DL
James Kunle Olorundare	UASG; NPOC; NCSG	JKO
Alexander Kruglov		AK
Waqar Ahmad		WA
Bill Jouris		BJ

Section 2a: Late Submissions

At its discretion, ICANN org accepted late submissions, which have been appended to this summary report.

Organizations and Groups:

Name	Submitted by	Initials
Registrar Stakeholder Group	Ashley Heineman	RrSG

Section 3: Summary of Submissions

ICANN org thanks all the contributors for their valuable input and feedback. All comments will be taken into consideration.

ALAC shares that the underlining issue remains a significant concern for string similarity. Many commonly used word processing software products underline the domain names. Users may not notice the below diacritic, *e.g.* the Letter O with Combining Macron Below (o̱ Unicode U+006F U+0331).

ALAC further comments that this issue is also present in other scripts.

BC considers string similarity review a critical aspect of the New gTLD Program to maintain Internet user trust in the Internet ecosystem and in the DNS. BC provides the following comments.

BC1. The singular-plural confusion issue must be addressed as previously emphasized a decade ago, even if only for those "certain European languages" cited in the Annex of the draft report.

BC2. More explanation or references regarding the semantic and phonetic IDN variants should be added to the draft as they pose a greater threat to TLD operators.

BC3. A flow chart should be added to clearly explain the pre-screening and post-screening processes in Section 10 - 12.

BC4. The document should include an appeals process or guideline to be followed by any TLD operator to promote transparency in the process and ultimately result in more consistent decisions.

RySG thanks the group for their work in updating the guidelines for conducting string similarity reviews to include variant strings and recognizes that the work of the String Similarity Review Panel is an important part of the application review process. RySG supports maintaining clear and comprehensive guidelines and methodology.

RrSG appreciates the work done by ICANN org in drafting these guidelines. The RrSG supports the proposed language in the draft guidelines, and does not have any additional feedback.

DL recommends that the evaluation is not only for strings that may cause visual confusion but also those that may share similar meanings. This includes evaluating distinctions between plural and singular forms, such as '.works' and '.work'. Additionally, attention should be given to strings that have similar meanings and objectives, as seen in examples like '.online' and '.onl', '.wed' and '.wedding', or '.world', '.global', and '.international'.

JKO comments that the guidelines serve the purpose of informing interested parties about the string similarity review, its goals, and how it contributes to a robust and user-friendly Domain Name System.

AK suggests that national legislation's impact on trademark laws should be considered in the reviewing process. ICANN org could provide guidelines for national registrar authorities to perform the string similarity review. AK also suggests using new approaches, *e.g.* Artificial Intelligence (AI) in the process.

WA emphasizes the importance of educational campaigns to raise awareness about the risks associated with visually similar domain names. WA further suggests that validation tools and a

feedback mechanism should be key components of the campaign to empower users to make informed and secure choices when registering domains.

BJ suggests the string similarity review process needs to consider the domain name automatic underlining practice by software.

BJ provides editorial suggestions for section 3.1, 3.2.2, 5.3.1, 9, 9.1, 10, 10.1, 11, Annex A, and Annex C. BJ also raises questions on how individuals can become aware of a proposed label to request manual screening and how a mechanism similar to 'allocatable' and 'blocked' variant can be utilized.

Section 4: Analysis of Submissions

ICANN org thanks all the contributors for their valuable input and feedback. All comments have been analyzed.

ICANN org appreciates the supporting feedback from RySG, RySG, and JKO. The editorial suggestions from BC3 and BJ will be incorporated in the updated version of the Guidelines.

The following outlines the feedback for each topic raised.

Underlining

The underlining consideration as raised by ALAC and BJ will be considered and further discussed in the next version of the Guidelines.

Singular and Plural

The singular and plural topic was raised by BC1 and DL. The topic is also a part of the Final Report on the New gTLD Subsequent Procedures Policy Development Process (Final Report), Recommendations 24.3 and 24.5. These recommendations extend the visual string similarity review to the following two aspects: a singular/plural check; an intended use check as relevant for identifying exemptions to the singular/plural check.

The ICANN Board did not adopt these recommendations on 10 September 2023, see the ICANN Board resolution (2023.09.10.19), and the Scorecard: Subsequent Procedures dated 10 September 2023, so the singular-plural analysis is considered out of scope of implementation at this time.

Phonetic and Semantic

The phonetic and semantic similarity was raised by BC2 and DL. The phonetic and semantic similarity are out of scope of string similarity review, as per the Final Report Recommendation 24.2. It is limited to visual similarity.

The phonetic and semantic similarity which raises up to the variant level has already been addressed in the Root Zone Label Generation Rules (RZ-LGR). For example, the "same" character in Simplified Chinese and Traditional Chinese.

Appealing Process and Local Legislation

The current guidelines are focused on parameters and process to be considered by the string similarity review panel. The Appeals Process and the Local Legislation, as raised by BC4 and AK, will be included in the Applicant Guidebook based on what is supported by the policy recommendations beyond the work done by this review panel and so it is not part of these guidelines.

Educational Campaigns and Tools

The need for education campaigns tools was raised by WA. The motivation for string similarity review will be captured in the Applicant Guidebook. The next round of new gTLDs, including a reference to the Applicant Guidebook, will be published at https://newgtldprogram.icann.org/ and will be broadly advertised by ICANN org.

Section 5: Next Steps

After analyzing the comments and incorporating them as needed, the updated version of the String Similarity Review Guidelines will be posted for a second Public Comment along with additional materials for string similarity review proposed in these guidelines by ICANN org.

Following the ICANN Board's consideration of Phase 1 Final Report on the Internationalized Domain Names Expedited Policy Development Process and the completion of subsequent work on string similarity review, ICANN org will update the guidelines and publish them for another Public Comment for finalization.

27 March 2024

String Similarity Review Guidelines

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide a comment on the [String Similarity Review Guidelines](). We appreciate the work done by ICANN org in drafting these guidelines.

The RrSG supports the proposed language in the draft guidelines, and does not have any additional feedback.

Sincerely,

Ashley Heineman
Chair, Registrar Stakeholder Group