

Public Comment Summary Report

Draft Guidelines for Advancing UA Adoption

Open for Submissions Date:

Monday, 23 February 2026

Closed for Submissions Date:

Monday, 13 April 2026

Summary Report Due Date:

Tuesday, 12 May 2026 (Extended from Tuesday, 05 May 2026)

Category: Technical

Requester: Other

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Open Proceeding Link:

<https://www.icann.org/en/public-comment/proceeding/draft-guidelines-for-advancing-ua-adoption-23-02-2026>

Outcome:

ICANN org thanks the community for its thoughtful comments. Generally, the respondents appreciate the effort invested by the UA Expert Working Group in compiling the set of stakeholder-oriented guidelines and support the guidelines published. The comments provide suggestions on updating the guidelines and prioritizing them. ICANN org will work with the UA EWG to finalize and publish the guidelines based on the public comments.

Section 1: What We Received Input On

The Universal Acceptance (UA) Expert Working Group (EWG) has developed guidelines for identifying strategic and practical mechanisms for encouraging UA adoption across a diverse set of stakeholders. The UA EWG has also suggested developing a framework to measure effort and outcome in the areas of awareness, policy support, implementation and capacity development towards UA adoption. ICANN asked the community to review the report for input on any gaps in the proposed guidelines, or any challenges in implementing them. ICANN also sought feedback from the community on how these guidelines should be prioritized for implementation.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Governance Primer	Mark William Datysgeld	GP
Internet Service Providers and Connectivity Providers Constituency	Philippe Fouquart	ISPCP
Coalition On Digital Impact	Nathalie Vergnolle	CODI
Ministry of Electronics and Information Technology, Government of India	Dheeraj Dheeraj	MEITY
GeoTLD Group	GeoTLD Group	GeoTLD
NetMission.Asia	Evin Erdogdu	NMA
Registrar Stakeholder Group	Sarah Wylid	RrSG
ccNSO Universal Acceptance Committee	Joke Braeken	UAC
Registries Stakeholder Group		RySG
At-Large Advisory Committee		ALAC
ICANN Business Constituency		BC
Governmental Advisory Committee	Benedetta Rossi	GAC
African Union of Broadcasting	Giacomo MAZZONE	AUB
Noncommercial Stakeholder Group	Farzaneh Badiei	NCSG

Individuals:

Name	Affiliation (if provided)	Initials
Diana Arteaga		DA
Azhar Ibrahim		AIB
Maxim Skvortsova		MS
Anil Kumar Jain		AJ
Richard Nims		RN
Enkhtsetseg Shirendev		ES
Khacle Huyen		KH
Diksha Neeladoo B. Simmandree		DS
Garv Chauhan	National Forensic Sciences University	GC
Joyeeta Sen Rimpee	ICANN85 FELLOW	JR
Benson King'Ori Mugure		BM
John Donaldson		JD
Fariz Ahmadi		FA
Nhat Huy Nguyen		NN
Cliff Agaba Mutegeki		CM
Joshua Ibitoye	SouthEast Missouri State University	JI
Preeti Kamra	Fellow APriGF, Member ISOC India, Delhi Chapter	PK

Muhammad Ali	NARALO	MI
Abdulrahman Abotaleb		AA
Valerie Yan Tong Chua		VC
Pablo Octavio Feria Hernández		PH
Nazma Akter		NA
Abdul Manaf Sulemana	ICANN85 Fellow	AS

Section 3: Summary of Submissions

This section presents the summary of submissions. Same or similar comments are collated. The summary may not capture all details of the comments, so the readers are encouraged to see the original comments submitted. The comments are organized into three sub-sections. The first set summarizes general comments. The second set of comments are on the specific guidelines or on specific stakeholders related to the charter questions for the UA EWG. The third set of comments are on how to prioritize the guidelines for implementation.

Generally, the respondents appreciate the effort invested by the UA Expert Working Group in compiling the set of stakeholder-oriented guidelines and support the guidelines published. The guidelines provide direction on stakeholder engagement across big tech, open-source communities, governments, academia, and technology providers.

Comments on broader UA topic and implementation of guidelines

RN notes that the guidelines correctly recognize UA as a foundational requirement for enabling a multilingual Internet. DS, ES note that, while technical compatibility is important, UA is fundamentally about digital cultural inclusion. When valid domain names or email addresses in diverse scripts are not properly supported, the issue becomes one of cultural exclusion. ICANN is encouraged to frame UA within the broader context of digital inclusion, engaging linguistic communities alongside technical stakeholders. NMA notes that across South and Southeast Asia, the next generation of Internet users will engage online in local languages.

ALAC says that from an end-user perspective, Universal Acceptance is not only a technical issue, but a matter of usability, fairness, trust, and digital inclusion, and is an important step towards the multilingual Internet. ALAC suggests it would be valuable to frame UA in terms of end-user-centric goals, such as the ability to register and use email addresses in local scripts, the ability to sign up for services using IDN email, improved accessibility for non-Latin script users, or a reduction of digital exclusion.

ALAC notes that the absence of UA creates substantial global challenges for end-users, including indigenous and minority-language communities. GC notes that UA failures are not merely technical inconveniences, they are mechanisms of rights denial at scale. Digitization, conducted without UA as a foundational design principle, produces systematic exclusion. BM also suggests recategorizing UA as a fundamental, rights-based design requirement for Digital Public Infrastructure.

DA notes that the scope of the charter was developed by ICANN org without community consultation. There are broader questions on why UA has not achieved meaningful adoption

over the years. DA also pointed out that the WG had limited interaction with the ICANN community.

AA, KH, RN, AIB, and DA suggest beyond awareness and self-reporting, UA requires an operational framework. This includes mechanisms for awareness, capacity building, procurement, and contractual requirements which should be measured for compliance or supported through incentives. Also, how will policy adoption be enabled? AIB suggests developing a UA maturity model for tracking progress. AA asks for localized capacity-building resources and region-specific strategies.

FA, JD, BM, DS, KH, AJ, MS, and DA ask who owns the implementation of the guidelines and ask how to integrate it into ICANN structures. The comments suggest that ICANN may consider evolving the working group into a standing group to provide guidance and oversight of the implementation of the guidelines. AJ suggests that implementation be stewarded by Supporting Organizations and Advisory Committees (SO/AC) nominees.

KH, and MS suggest the UA implementation work should address ICANN's FY26-30 Strategic Plan. KH, and AIB note that the guidelines remain in a voluntary tone and self-reporting, so measurement could be challenging. Further, a linguistically diverse testing framework should be developed. KH, AJ, and MS ask how UA connects with New gTLD 2026 Round success metrics. MS asks how it supports the Internet's security, stability, resiliency. RN suggests there are user experience, security, and fragmented deployment risks if UA is not adopted.

RN suggests including attendance details in addition to the list of contributors for transparency. FA suggests in-person deliberations of the working group and that all members of the group should interact with the community.

BM, and JR note that the guidelines should consider accessibility tools. JR says that the guidelines do not consider accessibility tools, such as screen readers. These are needed for digital inclusion and human rights, and ICANN should prioritize studies to investigate further. In addition, there is a lack of policy framework for the registries and registrars which can erode consumer trust.

BM suggests establishing a "UA Technical Assistance Fund." ICANN should go beyond producing technical documentation by establishing a micro-grant or technical assistance program to financially subsidize the labor costs for critical open-source maintainers, mid-tier SaaS platforms, and public-sector IT departments to execute the heavy lifting of legacy database schema migrations and Unicode compliance. NA also suggests policy levers, incentives and compliance mechanisms to accelerate uptake.

CODI also supports development of case studies on real-world implementation to accelerate UA adoption.

At a general level ISPCP notes the multiple strengths of the guidelines. These include technology stack framing, as well as a multi-level engagement strategy due to the complexity in big tech organizations. Additional strengths noted by ISPCP include the indicator framework covering awareness, policy, implementation and capacity development, as well as the consideration for an issue report on UA by registries and registrars. The ISPCP also writes the guidelines could note the current state of practice for relevant technology. ISPCP suggests including a repository for real world implementation examples. ISPCP also suggests ICANN org

should develop a plan with annual milestones. ISPCP also asked for planning implementation in phases, with milestones and targets to guide UA adoption efforts.

UAC asks how ICANN community structures, including ICANN's supporting organizations and advisory committees, could contribute to awareness-raising, coordination, and capacity development to strengthen the overall framework. UAC asks how these guidelines may be evaluated and updated with evolving UA requirements and operational experiences. UAC notes that from an operational perspective, ccTLD operators may face challenges in translating high-level recommendations into practical implementation steps, and it would be beneficial to determine concrete steps as part of the implementation.

RySG highlights the importance of IDNs and UA for the next gTLD round, and the need for coordinated efforts and ICANN org's leadership in achieving full UA readiness.

ALAC notes that multilingual Internet and digital inclusion is directly relevant for end users, however the guidelines largely deal with supply-side actors. ALAC adds that the consumer trust dimension could be strengthened, with guidance such as "Lack of UA support leads to failed registrations, rejected email addresses, and broken forms, thereby undermining trust in Internet services for users of non-Latin scripts." Governments have a role in ensuring consumer trust remains a priority. And, the multilingual Internet could be better framed by connecting it to accessibility, rights and inclusion, highlighting that UA enables minority and indigenous languages to flourish.

ALAC notes that there is variation in the level of detail. For instance, Open-Source tool prioritization and standards lists are well detailed, while others such as end-user outcomes or measurement are less developed. Also, since the UA EWG is advisory in nature, phrases such as "ICANN should..." are best avoided (maybe "ICANN Org may consider...").

BC recognizes the rationale to focus on a select set of stakeholders but is concerned that this may limit broader engagement. BC suggests continuing to build technical documentation for UA readiness and make it, along with the relevant work of UA Steering Group done in the past, available at a centralized, comprehensive, and well-structured documentation platform. BC shares reservations on guideline 2: 'Create a Dedicated Webpage for Each Stakeholder,' and, given the UA agenda and its mechanisms are inherently "universal", encourages these be presented within a unified framework.

To enhance dissemination of the important work, the GAC encourages ICANN org to consider developing a complementary, more concise and policy-oriented version of this document tailored to non-technical audiences and offering options for actions that match the roles and responsibilities of the various different stakeholders.

The GAC also suggests sharing more details on the implementation of the guidelines, especially how progress will be monitored and reported. Further, the GAC inquires if a process is envisaged for periodic review and update of these guidelines to reflect developments in Universal Acceptance adoption and the evolving needs of the Internet ecosystem. The GAC asks how ICANN community structures can contribute to advancing UA adoption, including through awareness-raising and capacity development efforts. The GAC notes the value of initiatives such as UA Day in promoting awareness and encouraging continued support and expansion of such efforts.

NCSG supports that ICANN org will have a coordinating role, and will need to prioritize the guidelines and report on their progress. It adds that a very broad set of stakeholders without a concrete order of execution of related guidelines creates a risk for implementation.

Charter question specific feedback

Charter Question 1: Big tech organizations

UAC, NMA, ISPCP, MI, JD, BM, and GP emphasize adding AI-assisted software development to the guidelines. GP suggests this in the sections dealing with open-source systems, software development professionals, and capacity-development materials. At a minimum, the guidelines should call for engagement with leading AI and developer tooling companies. The suggestion to create UA-compliant starter templates and CI/CD-integrated checks is already present in the draft for Large Language Model (LLM) training and evaluation. BM suggests ICANN should develop, host, and officially maintain a suite of "UA Compliance Docker Images" and marketplace GitHub Actions. PK and NN ask for the development of hands-on technical toolkits and testing environments for UA compliance (e.g., validation scripts, CI/CD integration examples, and testing datasets).

ISPCP further noted that AI systems (including large language models, AI-based email security systems, and AI-assisted development tools) may be considered as a distinct stakeholder category within the UA ecosystem. ISPCP suggests LLM-based UA support for tools which parse domain names and email addresses, spam-filters, code generators, voice-based assistants, their training data pipelines and diagnosis tools. NMA asks to update guideline 4 to include promoting UA-compliant input, rendering, and validation standards for AI-integrated systems and to collaborate with relevant bodies to ensure multilingual datasets. UAC suggests exploring AI for automated detection of non-UA-compliant applications and large-scale testing.

BM and AIB identified the following additional stakeholders: Startups, small and medium enterprises, content & creator platforms (such as blogging tools, CMS platforms, and digital publishing environments), financial services & e-commerce (payment gateways, banking workflows, and checkout systems), mobile ecosystem and mobile-first environments.

ISPCP suggests defining big tech organizations in the guidelines. It suggests including guidelines for cloud platform providers, as their services support applications which use them. The guidelines should include Content Delivery Networks (CDNs) providers to correctly handle IDN hostnames in TLS certifications, HTTP headers and caching keys. It suggests using the tech-stack for ICANN org to demonstrate progress. GeoTLD notes that defining UA readiness and adopting a tailored approach for different types of stakeholders is key. The UA EWG may consider adding a more generic formulation of this cornerstone guidance, before the current Guideline 1, and broaden Guideline 2 to include materials defining what UA-readiness means for individual stakeholders and what actions they can take to support UA adoption. When organizing a UA awareness or training event for different audiences, it is important to clearly and concretely define what UA readiness means for that specific group, why they should aim to be UA-ready, and what practical steps they can take to become UA-ready.

NMA suggests updating guideline 1 to include: "While not charter remit, explicitly include hardware/OS input mechanisms for accessible native-script typing/transliteration to enable practical IDN use."

BC also asks about establishing a clear criteria threshold for defining “big-tech” organizations, which may include metrics such as revenue, user base, geographic reach, or workforce size. It notes that startups, local developers, and small-to-medium enterprises are often closer to end-users and therefore play a more critical role in advancing UA adoption than large technology companies alone.

BC shares that security is a consideration for large Internet enabled applications (e.g., instant messaging apps, mobile money platforms, and social media) operating in environments where trust, security, and user confidence are critical to sustained adoption. UA can enhance usability, recognition, and trust. BC encourages the UA EWG to incorporate security and abuse mitigation considerations into its guidelines, highlighting the role of UA in strengthening user trust.

BC recognizes that commercial incentives are a primary driver for the adoption of internet-enabled applications. In this regard, BC recommends that Charter Question 1 – Guideline 3 (“Showcase Economic and Business Value”) and its subsections (a–d), currently directed at large technology companies, be expanded to apply to businesses of all sizes. BC further suggests that demonstrating the economic value of UA-ready IDNs, particularly in terms of access to new user segments and market expansion, should be central to the UA adoption strategy.

Charter Question 2: Open source communities

ISPCP notes that the guidelines should include email validator libraries, set up a fund to support under-resourced libraries, and flagging applications which are not UA ready through the package manager ecosystem (e.g. Maven). Alignment between open-source and commercially deployed validation code should be encouraged.

NMA suggests including UA focused learning modules in learning management platforms. It asks to engage with maintainers of educational open-source platforms based on regional linguistic impact rather than global usage metrics alone, and mandate UA-readiness as a non-negotiable goal in the development roadmaps of platforms with deep South and Southeast Asian deployment. NMA also suggests developing standardized open-source libraries for validation, linkification, and authentication.

ALAC notes that Free/Open Source Software (FOSS) has been mentioned as “open-source”, which is non-standard, creates problems while searching for “open source”, and suggests using terms consistently in the document.

BC encourages the UA EWG proposed strategy of working with the open-source community, and believes it’s most important to collaborate with the open-source community especially while building UA documentation. BC suggests the UA EWG engages more with the open-source developer community in getting the UA mechanisms well tested and solidified on different platforms.

Charter Question 3: Standards and Standards Organizations

ISPCP asks to specify standards organizations, and notes that guidelines should address DMARC, DKIM and SPF email authentication standards, TLS and X.509 certificate standards should be referenced in the context of IDN support, and advocates developing UA-relevant test suites and conformance testing frameworks. NMA asks to work more closely with IETF to address cross-script delivery challenges.

NMA asks to clarify ICANN's roles with internationalization processes. Suggests adding to guidelines 3 and 21: "Collaborate with the Internet Engineering Task Force (IETF) on Email Address Internationalization (EAI) and the Unicode Consortium on script encoding, while focusing on DNS-level UA enablement," and "Acknowledge the pipeline from Unicode standardization to Label Generation Rules (LGR), positioning UA as the operational layer enabling real-world deployment."

BC suggests developing standardization, accreditation, and certification programs, as such programs help to showcase success stories, maintain overall quality and motivate organizations to become UA ready.

Charter Question 4: Software development professionals

ISPCP asks to engage with developers of AI code assistants to make UA-compliant code. Also work with developer certification programs by cloud providers, Linux foundation, etc. to include UA competency and automated UA testing integrated in development workflows and in CI/CD pipeline.

KH notes that the guidelines recognize the importance of end-to-end user journeys but does not operationalize how usability will be validated. Introducing a UA user journey testing framework would provide practical insight into readiness beyond theoretical compliance.

JI adds that while interoperability and accessibility are well covered, UA adoption also introduces security considerations, particularly around handling IDN and email validation. Integrating UA guidance with existing security frameworks and best practices would strengthen adoption among technical stakeholders.

MEITY suggests that ICANN org should support the development and dissemination of UA-compliant libraries, APIs, and software development kits (SDKs) that simplify implementation, and designed for ease of integration across multiple programming languages and frameworks. MEITY suggests that ICANN org should facilitate the creation of a centralized repository of UA-related issues, solutions, and best practices, enabling developers across projects to collaborate and avoid duplication of effort, including a curated list of priority issues. ICANN should consider UA implications in emerging areas such as APIs, identity systems, mobile platforms, and AI-driven applications and proactively address these domains so that UA remains relevant in future technological developments. ICANN should support the development of tools and scripts to simplify UA implementation across hosting environments and work with cloud providers and infrastructure platforms to embed UA support into widely used services to enable adoption at scale. Additionally, provide validation tools, testing environments, and certification mechanisms to help standardize implementation and build trust.

NMA notes that UA failures are frequently detected too late in the software development lifecycle. So NMA suggests integrating UA and EAI validation checks into CI/CD pipelines so that failures are caught before code reaches live production environments. It also asks to provide open-source UA testing modules that development teams can plug directly into existing workflows. NMA also suggests lightweight offline UA validation libraries for users for 2G/3G networks and users with aging devices (for guidelines 27-30).

BC encourages leveraging social media, developer forums, industry events, and public relation channels- including press releases, technical blogs and international media—to increase awareness and adoption of UA initiatives. BC also suggests developing support mechanisms, e.g. an online discussion forum, to allow volunteers to contribute to solving community issues.

NCSG agrees with the draft's view that UA adoption can strengthen interoperability and security, and it welcomes the baseline standards section referencing the IETF, Unicode and related standards bodies. The NCSG notes that the draft is right to identify practical failure points such as email validation, credentials, authentication and sending services. NCSG therefore recommends that ICANN's implementation guidance defines minimum end-to-end test journeys covering registration, login, account recovery, transactional email, support channels and administrative interfaces. Those test journeys should be reusable across sectors so that measurement becomes comparable over time.

Charter Question 5: System administrators for Email and Other Systems

ISPCP asks to document risks for EAI support and provide evidence-based mitigation to address administrator caution. ISPCP also asks ICANN org to develop NOG-specific presentation materials.

Charter Question 6: DNS industry

ISPCP supports developing an issues report for UA adoption gaps in registries and registrars and supports incentive-based policy approach, adding guidelines for reseller and hosting provider platforms to support UA, emphasizing support of RDAP, and self-assessment.

NMA suggests Integrating UA compliance benchmarks into registrar accreditation and evaluation processes.

RrSG notes that it is supportive of guideline 22, as long as these remain guidelines or are addressed via direct communication with registrars, with no mandatory requirement to mend or update, particularly as the realities of upstream dependencies requiring UA updates continue to constrain registrars, and must be acknowledged. RrSG also notes that it generally supports the development of an Issues Report for UA Adoption, keeping in mind that any report that is too narrowly tailored risks misallocating responsibility for gaps that largely originate upstream in browsers, email clients, and enterprise platforms. RrSG writes that ICANN should include in this Issues Report an ecosystem gap analysis in order to fully understand and document the chain of responsibility inherent in UA Adoption. Given the variety in business models, a one-size-fits-all policy approach in the Issues Report may not account for this diversity. Also, while UA acceptance is important for the development of the Internet, attempting to incentivize behavior that may not be otherwise operationally or commercially beneficial to the business could lead to gaming and market tempering.

In the context of guideline 24, UAC suggests including references to tools used by regional ccTLD organizations (such as APTLD, CENTR), e.g. the idnworldreport.eu.

AUB suggests that the best allies for promoting UA are the ccTLDs, the geoTLDs and community TLDs, because they better understand the need to reach communities with local culture and language. In addition, AUB suggests to include WIPO, ITU and its Broadband Commission, UNCTAD, WTO in the list for outreach in guideline 25.

NCSG notes the guideline to consider an issues report for UA adoption. Given the WG acts in an advisory capacity, NCSG considers it important to preserve the boundary between implementation guidance and formal policy development. Any move from awareness and coordination into contractual or consensus requirements should therefore proceed through ICANN's established bottom-up processes.

For the DNS industry, NCSG asks that ICANN should promote a visible progression model built on existing technical resources rather than relying only on awareness messaging, including the UA Roadmap and EAI self-certification framework. The draft itself recommends periodic self-assessment by registries and registrars.

Charter Question 7: Hosting providers and Internet service providers

ISPCP suggests additional guidelines for consideration by UA EWG. ISPs and hosting providers could be locked in legacy infrastructure and piece-meal updates could pose risk. Spam filters may have an ASCII bias, UA support could create additional customer support requirements, and organizations may be constrained by service agreements. To address these and other gaps, ISPCP suggests developing a UA Readiness reference architecture for ISPs and hosting providers, engaging with spam filter providers to address bias against EAI, working with ISPs to pilot UA support, engage with host control panel vendors, and work to address UA readiness of recursive DNS resolvers. ISPCP also noted the need to address the “chicken-and-egg” dependency between infrastructure providers and application ecosystems, suggesting coordinated approaches to enable parallel adoption. It asks to work with enterprises to signal demand, and develop a minimal UA deployment specification, and to expand the support to the global ecosystem, ISPCP suggests ICANN consider providing a technical framework, certification program and other capacity building mechanisms. ISPCP also highlighted the need for enablers, including reference architectures, pilot programs, and coordinated ecosystem approaches, to support ISPs and hosting providers in operationalizing UA adoption.

Charter Question 8: Public sector and intergovernmental organizations

PK, and KH suggest that UA readiness must be accompanied by the promotion of adoption across platforms and service providers. Procurement-linked requirements, certification frameworks, and alignment with public sector digital policies could play a meaningful role in generating that demand.

MI, PK, CM, FA, and JD suggest UA should be positioned as a foundational requirement for Digital Public Infrastructure. They note that governments moving toward digital-first or digital-only services must ensure UA compliance across systems before rollout.

GC suggests that the guidelines should explicitly address government Digital Public Infrastructure as a priority deployment context for UA adoption. The essential services of welfare, health, education, civic participation should be identified as high priority for UA compliance. Further, GC suggests the guidelines should recommend that all government digital systems support UA before essential services are migrated to digital-only delivery. GC also notes the Guidelines should recommend civil society and community inclusion in UA adoption assessments. AA suggests providing model policy language, procurement guidance, and practical frameworks that governments can adapt to accelerate UA adoption in Digital Public Infrastructure. AA also suggests including use cases for greater engagement of civil society and user communities.

FA, JD, BM, and JR suggest that ICANN should work with the GAC to provide model UA procurement language for governments to adopt. JR notes that ICANN should also lead the development of a consolidated reporting dashboard.

ISPCP suggests engaging with telecom regulators as key stakeholders in advancing UA adoption. It further suggests ICANN developing a model UA procurement clause that governments can adopt. ISPCP notes that UA should be included in national digital infrastructure as means of improving security. ISPCP further recommends strengthening the guidelines to explicitly address the social and public impact of UA adoption.

ISPCP suggests specific guidelines for AI tech providers, asking to engage with them on training data diversity, UA support in AI code generation, removing bias of EAI in email security and spam filtering vendors, determine UA benchmark for testing AI systems, and include AI support in UA measurement framework.

CODI notes that governments increasingly rely on Digital Public Infrastructure to deliver services, and ensuring that these systems support multilingual identifiers is essential for inclusive access. So ICANN should encourage governments to include UA readiness in public procurement requirements, support UA in public services, integrate UA into national digital transformation strategies and work with GAC to explore methods to integrate UA-readiness in related government policies.

MEITY suggests that ICANN should promote the inclusion of UA requirements within national digital policies, e-governance frameworks, and public procurement standards, ensuring that UA becomes a foundational requirement for government-funded digital services and platforms. MEITY notes UA should be positioned as a key enabler of broader national and global development priorities, including digital inclusion, economic growth, language preservation, and equitable access to digital services. Aligning UA with digital public infrastructure initiatives and multilingual governance strategies, MEITY writes, will elevate its importance from a technical consideration to a strategic policy objective.

AS shares that for scalable incorporation in the public sector, collaboration is needed with intergovernmental and development organizations which fund digital transformation initiatives across multiple countries. AS suggests ICANN could explore opportunities to integrate UA compliance into such frameworks, noting that organizations which demonstrate UA compliance could be incentivized.

NMA suggests that UA adoption should transition from a voluntary best practice to a compliance-driven requirement embedded in public policy, procurement systems, and measurable accountability frameworks. It proposes that after “Digital Public Infrastructure (DPI)” (Guideline 31), insert: “Mandate UA compliance (including IDN and EAI readiness) as a required condition in public procurement, national broadband plans, and e-governance systems, validated through standardized benchmarks.” NMA also asks to add focus on usability of DPI as a global interoperability requirement, by adding: “Encourage UA adoption in cross-border public sector platforms (e.g., tourism, e-visa, cultural services), ensuring systems accept and process diverse native scripts.” It also suggests leveraging the binding international commitments on multilingualism by adding: “Position UA as the implementation mechanism for linguistic accessibility commitments under global frameworks such as WSIS+20 (Para 28).”

NCSG recommends that ICANN org develop model UA procurement language, sample testing clauses and short implementation checklists that governments, universities, public-interest institutions and contractors can adopt voluntarily. That would convert a promising idea in the draft into a practical demand-side instrument, while remaining transparent, non-discriminatory and mission-compatible.

RySG notes that the current draft focuses on intergovernmental organizations but lacks a direct emphasis on the role of national governments, which are uniquely positioned to disseminate UA information across public and private sectors. RySG recommends the guidelines to explicitly encourage GAC members and government departments managing digital standards to lead by example, ensuring equitable digital access across all government-managed platforms.

ALAC says that while the EWG is clearly within scope to discuss engagement with governments, IGOs, and the public sector, language that appears to endorse or promote governmental mandates risks going beyond the Charter's advisory role.

AUB notes UN system processes showcasing social and cultural values where UA should be incorporated. In the 2027 revision of the Global Digital Compact (GDC), AUB suggests UA should be recognized more explicitly as part of the importance of meaningful access. AUB says it is fundamental that UA is recognized as part of implementation of digital transformation by the Commission on Science and Technology for Development (CSTD). AUB also notes it would be useful to have specific action lines on UA in WSIS+20 follow-up. UA has already been discussed as part of Policy Network for Meaningful Access (PNMA) and Dynamic Coalition at Internet Governance Forum (IGF), and AUB suggests it could be added as a specific goal to be discussed at its national and regional initiatives. AUB also says UA should also be included in AI related debates globally, e.g. AI for Good by ITU and the Global Dialogue on AI Governance. AUB notes that technical companies are only present at IGF and WSIS follow-up, but not all of these forums. An issue report, if developed, could be used in the outreach of these organizations as well. AUB suggests collaborating with World Broadcasting Unions and its members for UA outreach.

Charter Question 9: Academia

NN suggests partnering with universities and technical communities in developing regions to integrate UA into curricula and developer training programs, and providing localized documentation, implementation guides, and case studies to reduce barriers for non-English-speaking developer communities.

VY notes that the recommendation to embed UA within existing courses rather than as standalone content is well-judged and supports engagement with ACM-IEEE curricular recommendations. VY suggests preparing teaching materials for non-specialist instructors, developing problem sets, and case materials.

MEITY shares that strengthening collaboration between academia and industry will ensure that UA education is aligned with real-world requirements. ICANN should facilitate partnerships that enable students and faculty to work on practical projects, internships, and joint research initiatives with industry stakeholders, increasing the relevance and impact of academic engagement.

AS says that ICANN could explore engagement with university ranking bodies and quality assurance frameworks to position UA within existing indicators such as digital readiness, internationalization, and innovation. Barriers to adoption can also be lowered, AS notes, by providing small grants for curriculum development, technical assistance and teaching resources.

NMA asks that rather than building parallel awareness infrastructure, ICANN org should work with organizers of existing national and university-level coding competitions to embed UA-specific problem statements directly into their events. It suggests training youth as UA ambassadors to carry this knowledge into classrooms, communities, and national IGF processes. NMA also suggests including secure parsing, normalization practices, and threat awareness in UA training programs. NMA also suggests including "women-led digital economy platforms" in educational systems in guideline 10.

UAC notes that regional and national IGF forums, IG summer schools and youth tracks on Internet Governance could be used for UA awareness and training in UA adoption.

ALAC says that the role of civil society organizations could be incorporated, to promote local-language email adoption, test UA readiness, or explore user experiences. They could also help in motivating technology companies as well as governments to treat UA as a priority.

BC supports the inclusion of universities, particularly in non-English-speaking communities to advance UA research and development. BC suggests establishing a dedicated platform for UA research initiatives and consider providing financial and technical support for selected research projects.

NCSG strongly supports the portions of the draft that acknowledge the roles of civil society and At-Large structures, of public institutions responsible for language, education and digital services, and of academia across multiple disciplines. NCSG recommends that ICANN treat community participation as an implementation workstream in its own right. Key materials, self-assessment templates and case-study formats should be made available at least in ICANN's official languages and designed for local adaptation. End-user testing should include community-based organizations, disability organizations, linguistic communities and At-Large structures, not only vendors and operators. Where the draft recommends a network of 25 to 100 academic hubs, NCSG suggests ICANN should ensure that the selection model is geographically and linguistically balanced and does not privilege only already well-networked institutions.

Charter Question 10: UA Indicators and Measurement

AA suggests including minimum UA-readiness benchmarks and sector-specific checklists.

PK, DS, KH, RN, and AJ ask to strengthen EAI adoption as it is key for enterprise communication, public delivery and authentication. Also, they ask to include usability indicators e.g., users being able to use IDNs and EAI across platforms.

RN suggests that the introduction of voluntary self-assessment templates complemented by independent validation mechanisms could be explored over time.

JI supports the measurement framework which adds to the strength of the guidelines, but notes that the success will depend on making reporting lightweight and incentivizing participation. MI

suggests the ability of consumers to consistently use their email addresses and domain names across platforms as a measure of success.

ISPCP suggests including ISP-specific and AI-specific indicators, and emphasized the importance of defining measurable, operational metrics such as end-to-end system behavior reflecting real-world UA adoption. VY shares that end-to-end user journey requires automated testing infrastructure. Self-reporting and incentive structures may produce optimistic data, and that indicators should be independently verifiable. CODI suggests expanding the measurement framework to capture real-world user experience, including application-layer indicators, i.e., the extent to which applications and platforms support IDNs and EAI in user interfaces and in authentication and account registration systems; the developer ecosystem indicators, i.e., availability of UA compliant libraries and frameworks and UA test suites for developers; and user-experience indicators, i.e., end-to-end success rates for online workflows using IDNs and EAI across application categories (e-commerce, social media, messaging platforms). CODI suggests that ICANN develop a public-facing tracking and testing platform for UA readiness at application layer to create a system of accountability and incentives for improvement and lowering barriers to testing and validation.

MEITY also suggests that ICANN org should develop uniform metrics, standardized definitions, and reporting frameworks for a meaningful comparison across regions and stakeholders, facilitating more effective analysis and decision making.

NMA recommends enhancing guideline 43c to add: “Adopt script- and language-based metrics, including: percentage of applications supporting IDNs and EAI, UA compliance across public digital services, and real-world success rates of IDN/EAI transactions.” NMA suggests making the data gathered on these metrics publicly available through dashboards. Also, the UA adoption should be through enforceable mechanisms, and suggests adding: “Transition UA to a compliance-oriented ecosystem standard, supported by procurement enforcement, benchmarking, and public accountability mechanisms.” NMA also suggests collaborating with National IGF youth chapters for survey and reporting.

The RrSG is supportive of reporting the key indicators in guideline 43, as long as this information is provided in aggregate, not published for individual registrars.

UAC adds an approach to track progress should be jointly developed by ICANN and the relevant stakeholders to assess the impact and effectiveness of implementation of UA across different stakeholder groups including ccTLD operators. UAC also suggests that ICANN org and the community use the evaluation tools, and also report on the current solution.

ALAC notes that guidelines do not define concrete indicators and asks how these could be defined and institutionalized. Metrics should be identified and, where feasible, standardized. Possible metrics include, for instance, the percent of websites accepting IDN emails, percent of email providers supporting EAI, and UA readiness of major platforms. Other metrics such as a list of UA-ready registries and registrars may help in incentivizing UA adoption and rewarding early adopters.

NCSG strongly supports the measurement architecture proposed in the draft. The text is right to call for indicators that are clear, reasonably high-level and not prohibitively costly to collect over time. It is also right to propose a UA reporting dashboard and to organize indicators across awareness, policy support, implementation and capacity development. Particularly valuable is the identification of end-to-end success of the end-user journey as a key cross-cutting indicator.

However, NCSG notes, ICANN org should also publish a measurement methodology, an initial baseline and a regular reporting calendar, and suggest a specific timeline, where measurement should remain outcome-oriented. Public reporting should show whether users can successfully register, sign in, receive email, recover accounts and complete transactions using valid IDNs and EAI across real services. Persistent bottlenecks and recurring failure patterns should also be disclosed.

Feedback on prioritization

AIB suggests prioritizing the work in near-term, mid-term and long-term items and suggests strategic opportunities. RN also suggests an order for implementation, from email ecosystem, DNS industry enablement, public sector adoption, hosting stack incorporation, developer tools integration, and academic integration.

MS suggests a phased Implementation.

- Phase 1 (0-12 months) - Foundation: Define UA-readiness comprehensively (Guideline 1), Baseline standards promotion (Guideline 13), DNS industry systematic engagement (Guidelines 22-26), Measurement baseline establishment (Guidelines 42-45), and ICANN systems 100% UA-ready (organizational leadership).
- Phase 2 (12-24 months) - Ecosystem Development: Open-source application priorities (Guidelines 8-12), Big tech business case development (Guidelines 3-7), Developer capacity building (Guidelines 16-19), and Public sector engagement via IGOs (Guidelines 31-35)
- Phase 3 (24+ months) - Sustainable Transformation: Academic curriculum integration (Guidelines 36-41), Standards organization contribution (Guidelines 14-15), and System administrator outreach (Guidelines 20-21)

NA suggests an implementation framework with short, medium and long-term milestones.

JI adds that a model focusing first on core infrastructure components such as email systems, authentication mechanisms, and DNS tooling, would help reduce dependency bottlenecks and accelerate adoption. MI also suggests that as UA problems are most apparent to users in widely used systems like identity systems, email validation tools, login forms, and government digital services, the efforts should start there.

PK suggests prioritizing core infrastructure, followed by developer ecosystem, policy and procurement integration and capacity building, where scalable adoption will depend on measurable outcomes, ecosystem coordination, and stronger alignment with broader Internet governance and digital public infrastructure frameworks.

ISPCP also proposes three-tiered priority areas. The first tier should establish baseline measurements, commission an issue report on UA adoption by registries and registrars, engage AI code generation tool providers, engage with email security and spam vendors, develop ISP UA reference architecture, fix email validator libraries and set up a UA support center. The second tier should develop stakeholder specific webpages, publish UA procurement clauses for governments, launch an ISP UA pilot program, engage with DCN providers, develop a UA benchmark test suite for AI systems and engage hosting control panel providers. The third tier should focus on UA curriculum integration, IGO engagement, and public sector outreach. VY

notes that ASCII centric training materials can create UA challenges and so should include AI indicators.

ISPCP also proposes additions to the global public interest and human rights considerations. It says that UA adoption directly advances the right to access information in one's own language - a human rights principle recognized in multiple UN frameworks. ISPs and hosting providers are a critical enabler of this right, as their infrastructure determines whether multilingual domain names and email addresses are practically usable by end users, regardless of what is technically registered or resolved at the registry level. The guidelines correctly identify that UA adoption supports digital inclusion. ISPCP notes that the populations most likely to benefit from UA (speakers of non-Latin-script languages in developing regions) are also disproportionately represented among the customer bases of regional ISPs and hosting providers. ICANN's engagement with these providers is therefore not merely a technical exercise but a direct contribution to digital equity. Finally, AI systems that are not UA-ready may perpetuate or amplify existing digital divides by providing lower-quality service to users whose language or script is underrepresented in training data. The human rights dimension of AI-related UA gaps deserves explicit attention in the UA EWG's final guidelines.

Finally, ISPCP suggests ICANN develop a clear implementation approach, designate clear ownership of the implementation, and suggests a continued role of the expert working group. It also suggests ICANN should establish a transparent monitoring and reporting mechanism.

CODI suggests expanding the operational definition of UA-readiness to include correct detection and parsing of domain names and email addresses in application interfaces, their linkification, and compatibility with multilingual identifiers in authentication systems, messaging tools and content platforms.

CODI suggests that ICANN prioritize development tools for IDN and EAI validation and parsing and UA-compliant linkification including widely used open-source libraries, automated UA testing framework, and developer-facing implementation guides for programming languages and frameworks. CODI adds that ICANN encourages UA adoption through default-enabled support in hosting platforms and control panels.

UAC suggests that priority be given to areas such as improving software compatibility, addressing validation limitations, and supporting IDN and email address internationalization at the application level. In parallel, the development of a concise, policy-oriented version of the guidelines may facilitate engagement with decision-makers and support broader dissemination. UAC encourages the development of concrete use cases, phased implementation pathways, and improved guidance on priority areas.

ALAC suggests considering a UA Adoption Maturity Model, such as: Level 1: Awareness, Level 2: Partial Support, Level 3: Full UA Readiness and Level 4: Ecosystem Integration. ALAC writes this would make measurement and progress tracking easier.

NCSG says the guidelines note that UA is an outcome of internationalization across technology stack presented in the guidelines. So, the order of systems and services in the stack can drive implementation sequencing. ICANN org should first identify and prioritize horizontal dependencies whose remediation unlocks multiple downstream systems and services. The open-source section already offers a strong model by highlighting core functions such as domain and email validation, support for local-language email addresses, linkification, slug handling, authentication, email transmission and spam filtering. These are high-leverage

intervention points, because failure at this layer propagates across large parts of applications impacting the user experience.

For that reason, NCSG recommends that ICANN org publish, after completion of this public comment process and before implementation begins, a phased roadmap. A first phase should address foundational dependencies and standards uptake. A second phase should focus on high-impact deployments in registrars, hosting environments, email services and public-facing services. A third phase should focus on measurement, remediation and replication of effective practices. The roadmap should identify owners, dependencies, intended outputs and public review points. NCSG further recommends that each implementation action be mapped against existing resources so that the guidelines add coordination and scale rather than duplication.

Appendix B notes that support for accessibility tools such as screen readers was not expressly taken into consideration and would require further work. NCSG believes that this work should be incorporated into the core implementation plan rather than deferred indefinitely. Accessibility should cover screen readers, keyboard navigation, input methods on mobile devices, multilingual error messaging and compatibility with assistive technologies.

Section 4: Analysis of Submissions

ICANN org thanks the community for appreciating the work completed by the UA Expert WG and for their feedback and additional suggestions.

As noted earlier, the comments are organized into three sets. The first set summarizes general comments. These include comments on the relevance and impact of UA, the transparency of the UA EWG's work, the UA EWG's engagement with the community, as well as the mechanism for implementing the guidelines after the UA EWG finalizes them. As these comments are not related to the content of the guidelines but are of more general or operational nature, their analysis is provided below.

The second set of comments are focused on the content of the specific guidelines or on specific stakeholders related to the charter questions for the UA EWG. UA EWG members will discuss this feedback. Based on the discussion and further input from UA EWG, the existing guidelines may be updated, or new guidelines may be added. This part of the feedback is not analyzed further in this report.

The third set of comments are on how to prioritize the guidelines for implementation. UA EWG will discuss this feedback. Based on the discussion, UA EWG may suggest adding certain prioritization to the guidelines. ICANN org will also use the input from the UA EWG and the community for developing its implementation plan for these guidelines. This part of the feedback is not discussed further in this report.

The comments suggest that UA forms part of the broader challenge of enabling a multilingual internet for digital inclusion and has an impact on usability and trust. The feedback will be considered by UA EWG in defining UA. ICANN org will also review to determine how these elements may be integrated into its broader UA-related messaging.

The scope of work, defined in the UA EWG's [charter](#), focuses on stakeholders prioritized by the community in its work on UA over the past decade. The UA EWG discussions have been transparent and open to the community. All the call recordings, along with meeting notes and

participation details of the UA EWG members, are posted at UA EWG's [working space](#) and are available publicly. The UA EWG email list is also archived publicly. The UA EWG finalized the draft guidelines and published these for public comment well in advance of the ICANN85 meeting allowing the community time to review and prepare for discussions in Mumbai. At ICANN85, a dedicated UA session was organized to present these guidelines to the community to seek their formal input through the public comment process. In addition, the guidelines were also presented to the different Supporting Organizations and Advisory Committees, including ALAC, GAC and the GNSO. ICANN org aims to conduct additional sessions once the guidelines are finalized by the UA EWG and published.

Community engagement and input on UA is important. The UA EWG was set up to get input from the expertise available in the community, including representation from the SOs and ACs. In addition, different SOs and ACs have set up working groups on IDNs and UA, as they deem necessary. Examples include the UA Committee of the ccNSO and GAC's UA-IDN Working Group. ICANN org continues to support these working groups for the community to organize their work on IDNs and UA and also interacts with them regularly.

The guidelines developed by the UA EWG are intended to provide direction for ICANN org's work on UA adoption. In addition, ICANN org aims to assess any input provided by the UA EWG and the input provided by the community on prioritization of these guidelines. Based on the input ICANN org aims to devise a plan for implementing these guidelines. ICANN intends to provide updates on its implementation of these guidelines and engage with the community for feedback during its regular updates and consultations at ICANN meetings.

With the focus on directly implementing UA-related work, ICANN org has strengthened its organizational structure by setting up a cross-functional team focused on IDNs and UA providing a broader framework for implementation, in addition to the implementation work being done by ICANN org's dedicated IDN-UA Program team. These teams are advised by ICANN org's executive Steering Committee. This structure is intended to support implementation efforts, address operational considerations, and track progress against ICANN's Strategic Plan for FY26-30. The direction of the work is reviewed regularly by the ICANN Board, through its Board IDN and UA Working Group, which provides oversight to ICANN org's work on IDNs and UA.

In summary, in line with the strategic priorities for FY26-30, ICANN org has put in place a multilayered structure for management and oversight of its work on IDNs and UA and continues to engage with the community and support the community's work on IDNs and UA.

With regards to funding community initiatives on UA, ICANN already supports [UA Day](#), a community-focused program to promote awareness, adoption, capacity building and regional strategy development related to UA. Further, ICANN has [launched](#) the UA Curriculum Program to develop sustainable capacity through technical degree programs at universities in the different regions. ICANN also continues to support UA Local Initiatives to promote adoption in different countries and regions. There is also an opportunity for the community to apply for funding through the [ICANN Grants Program](#). Two grants were awarded for UA-related projects in the Grant Program's 2025 round.

The specific feedback provided by the community on the guidelines and their prioritization will be discussed with the UA EWG in the coming weeks. The UA EWG will also consider the input

to finalize the guidelines for publication and to propose any prioritization of the guidelines for implementation.

Section 5: Next Steps

ICANN org will work with the UA EWG to update and finalize the guidelines in the weeks following the public comment. These guidelines will then be published. Following their publication, ICANN org will assess the guidelines and prioritize them for implementation. ICANN org will continue to provide updates to the community as it implements the guidelines.