

Report of Public Comments

Title:	Variant Issues Project -- Chinese Case Study Team Issues Report		
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Section I: General Overview and Next Steps			
<p>ICANN has conducted six case studies of individual scripts to investigate any issues that need to be resolved to facilitate a good user experience for IDN variant TLDs. This report provides a summary an analysis of comments submitted for the Chinese case study report. ICANN will complete a consolidated issues report that will summarize and synthesize the issues identified by the case study teams. It is expected that the results of the case studies will play a crucial role in the identification of solutions towards the delegation of IDN variant TLDs.</p>			
Section II: Contributors			
<p><i>At the time this report was prepared, a total of three (3) 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>			
<u>Organizations and Groups:</u>			
Name	Submitted by	Initials	
At-Large Advisory Committee (ALAC)	Matt Ashtiani	ALAC	
<u>Individuals:</u>			
Name	Affiliation (if provided)	Initials	
John C. Klensin	John C. Klensin	JCK	
John C. Klensin	John C. Klensin	JCK	

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).

Summary of Comments from JCK Applicable to Just the Chinese Case Study Team Report

1) JCK provided a complimentary view of the Chinese report. He noted that 1) the report is well written and thorough, 2) it provides a tutorial on the uses of characters in the script, 3) the Chinese team has representation of each of the languages that uses the script, 4) the issues and approaches identified are partially based on significant implementation and deployment experience.

2) JCK called attention that the Chinese report does not seem to “take direct advantage of any notions of an SC string and a TC string being “the same” or “equivalent.” Instead, the intent is to enable SC content, handling, and subdomains if the TLD is in SC form. The related TC TLD might well support the same general structures as its SC counterpart, but they are not bound together by technical means. Instead, the relationships can be preserved only by strong commitments and professionalism on the part of registrants. Since it is almost certain that some registrants will be less committed or professional than others, the approach also calls for an alert registry with the ability to enforce policies fairly, consistently, and without concerns about interference by external forces (especially external forces that may not behave consistently).

Summary of Comments from JCK Applicable to All Case Study Team Reports

JCK notes that in most areas, most of the teams are to be complemented on being very careful to consider the broader issues—at least those within what they perceived as their scope—and avoiding producing a fantasy wishlist. JCK’s comments are organized into four areas as follows: 1) Very High Level Issues (but still about the DNS); 2) What Characters are in a Script?; 3) Specific Issues and Further Study; and 4) An Even Higher Level Issue.

Summary of Comments from the ALAC

1) The ALAC recognizes the significance and importance of IDNs and recommends that the Board set aside financial and technical resources for outreach purposes on the adoption and accessibility of IDNs and factor it into the 2012 - 2015 Strategic Plan.

2) The ALAC advises the VIP case study teams to identify and report on the types of issues that should be handled as IDN variant issues versus those that should be handled by other user confusion avoidance mechanisms applicable overall to non-IDN as well as IDN TLDs.

3) The ALAC also advises VIP case study teams to also identify the readiness of implementation, including the level of consensus within the language community, the impact across languages, and most importantly to avoid

disadvantaging language communities that have implementable policies available.

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.

IDN VIP Chinese Case Study Team Response to Public Comments

1. Response to comments made by John C. Klensin (JCK)

The Chinese team thanks Dr. Klensin for his review and appreciate his earlier review of the Chinese report.

Regarding Dr. Klensin's second specific comment to the Chinese case, the Chinese team agree in principle with his comments and would like to provide some clarification:

- a. In the Chinese domain name community, there is universal consensus that a simplified Chinese and traditional Chinese domain labels should be allocated to the same registrant. This practice is specified by RFC 3743 and RFC 4713 for the *registration* of Chinese variant labels, and is currently practiced by all Chinese Domain Name Consortium members.

- b. Regarding the question whether registrants expect these two labels *resolve* to the same nameserver, there is general consensus that they should, but there is variation of practices to achieve this. We sample three ccTLD registries' practice: CNNIC, TWNIC and HKIRC.
 - i. In CNNIC, the delegated variant pairs (SC and TC) resolve to the same nameserver. They employ a practice called "parallel provisioning", where the SC and TC label is delegated separately, but the contents of the delegated zones are maintained together and from the same backend database. Updates to one also update the other.
 - ii. In TWNIC, the delegated variant pairs (SC and TC) also resolve to the same name server. DNAME is used, for more information about how DNAME is configured, please find the following TWNIC document: <http://www.twnic.net.tw/english/dn/pdf7a.pdf>.
 - iii. HKIRC, registry operator for .hk and .香港 (xn--j6w193), does not deploy either parallel provisioning or DNAME for their second level IDN variant labels. The rationale is that DNS works by delegation of responsibilities, and operators of a zone has incentive to make sure its zones are managed properly. In the case of the management of variant domains, the operator has every incentive to make sure that end users are not confused. Its operation of IDN.hk and IDN.香港 that uses this policy has so far received no user complaints (see section 6.4 of Chinese report)
- c. Last but not least, we note that some registrants may choose to provide SC and TC content depending on the queries received in the application server level.

Finally, the Chinese team went through Dr. Klensin's general comment to all the teams and agree in principle with what he has raised. However, we do not see any particular comment that requires response from the Chinese team.

2. Response to comments made by ALAC

- 1) The Chinese team agrees with all the recommendations provided by the ALAC.
- 2) Regarding ALAC's second point, in the Chinese case study, we define variants as "Characters with different visual forms but with the same pronunciations and with the same meanings as the corresponding official forms in the given language contexts" (Section 5.1 of the Chinese Report). We do *not* consider issues regarding visually confusable characters as variant issues, and do not think they should be mixed, our rationale as follows:
 - a. Background: visual confusable character (in Chinese called 形近字 "characters with similar shapes" (U+5F62 U+8FD1 U+5B57)) is an important IDN issue for the Han script. There are many examples of visual confusable characters in Chinese. For example, lumber 木(U+6728) and skill 术(U+672F); "silver" 银(U+94F6) and "very" 很(U+5F88). More examples of visual confusable characters can be found in the following list¹ and in the following dictionary².

¹ See commonly Chinese Characters that looked alike:
<http://lhx777.com/ywfi/ywcs/wz/ztwz03.htm>.

- b. Fundamentally the user expectation for visual confusable TLDs is very different from that of the variant TLDs. In the case of visual confusable TLDs, to preserve security and avoid user confusion, TLDs that are visually confusable to an existing TLD could be blocked or reserved. However, for variant TLDs they should be allocated and delegated to the same registrant and resolve to the same location.
 - c. Based on the reasons above, we recommend that the two issues (variant vs. confusingly similar labels) be dealt separately for the Chinese. We note that the current ICANN processes for handling string similarity should be able to handle visually confusable labels.
- 3) Finally, regarding ALAC's point to identify the readiness of implementation including the level of consensus within the language community, the Chinese team note that the Chinese community has been operating IDN variants at the second level since 2005 with registration policies defined in RFC 3743 and RFC 4713. The IDN table is a single table agreed by the Chinese Domain Industry (CDNC). The Chinese ccTLD community also had experience operating synchronized IDN TLDs (.中国/中國, “.taiwan (.台灣/台湾)” since 2010 and they have received no complaints from end users so far (section 6.4 of the Chinese Report). On this issue, we also note that ICANN is conducting a ccTLD variant experience survey, the results of which would address ALAC's question.

² Dictionary of Chinese Characters that looked alike: <http://www.amazon.cn/常见形近字辨析字典-庞晨光/dp/B0011BVEHU>