

Report of Public Comments

Title:	Variant Issues Project -- Greek Case Study Team Issues Report		
Publication Date:	29 November 2011		
Prepared By:	Julie Hedlund		
Comment Period:		Important Information Links	
Open Date:	07 October 2011	Announcement	
Close Date:	14 November 2011	Public Comment Box	
Time (UTC):	23.59	View Comments Submitted	
Staff Contact:	Julie Hedlund	Email:	Julie.hedlund@icann.org
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 Greek 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 four (4) 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	
Jimmy Kyriannis	Jimmy Kyriannis	JK	
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 JK

JK poses a question to the Greek Case Study Team regarding the text which appears in Paragraph 5 of Page 17 in the Greek Case Study Issues Report at: <http://www.icann.org/en/topics/new-gtlds/greek-vip-issues-report-07oct11-en.pdf> (which is marked as Page 13 within the Report itself): JK noted that while he appreciates the need to mitigate the risk of confusability and to promote user-friendliness, he notes that the decision to equate πότε with ποτέ appears to be in conflict with the text in the paragraph immediately prior to it (Paragraph 4) on the same page, regarding the use of accent marks. In particular, JK notes that although the difference in meaning between the words πότε and ποτέ may not be of major significance as it relates to the adoption of Greek TLDs, he wonders how the Review Team might consider the case of the words Αθήνα and Αθηνά where the former refers to the capital city of Greece, Athens, and the latter refers to the Greek goddess Athena. In particular, JK notes that based on the meaning expressed within Paragraph 5, a party wishing to register the gTLD Αθήνα – if awarded – would receive αθήνα. as well as control over αθηνά. JK asks the Team what would then become of the party wishing to register the gTLD Αθηνά? He notes that the recommendation in Paragraph 5 suggests that the second party would be denied that privilege. JK asks whether the Team has considered this particular case or those of other similar pairs of strings, which may have significance within Greek culture or history, and thus be of interest to Greek TLD applicants? I believe the implications go beyond the difference between the words πότε and ποτέ.

JK suggests an alternate approach to the issue. In particular, using the above case as an example, the matter could be addressed by treating the TLDs for Αθήνα (αθήνα.) and Αθηνά (αθηνά.) as two entirely different domains available for two different registrants to operate, while disallowing the atonal TLD of αθηνα, which would be a source of mutual conflict. JK suggests that this would be consistent with what is suggested in Paragraph 4 as the “no-accent-no-final-sigma” approach. JK adds that this approach would serve to preserve the spirit of the text within Paragraph 5, which he reads to be to preserve the “real representation of the Greek Language and its grammar”, while also providing for the disambiguation of the two tonal variants.

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

JCK finds the Greek Case Study Team Report profoundly disappointing. He notes that the report indicates that domain names are not generally considered as words. However, JCK also notes that the Report points out that many domain names are words. Then, he notes that the Report immediately jumps to the assumption that the DNS must support all of Greek orthography in the root including variations in the ways words can be written. JCK emphasizes that although one can spell out rules and requirements that work under those conditions, these conditions are appropriate to computer generation, encoding, and collation of Greek literature and other textual work. They are not appropriate to the DNS root zone. JCK recommends that the Report be rejected as unresponsive to the scope and intent of the [TLD] Variant Issues Project.

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. JCK's comments in each area are briefly summarized as follows:

1. Very High Level Issues (but still about the DNS)

JCK notes that the DNS is an exact-match lookup system in which one must know exactly what one is looking for to find it. He adds that the DNS, especially in combination with a general design style for Internet application protocols that goes back to the 1970s, makes it a poor match for anything involving natural language, even when the relevant natural language was restricted to the subset of English that can be written in the ASCII character set. JCK adds that IDNs don't introduce fundamentally new problems, but they magnify them and expand their scope in many different directions.

JCK also notes that there is no agreement about what the term "variant" means in the reports. He hopes that this project will clarify the usage of that term within ICANN remains in the category of future work and consensus. However, JCK adds that if that consensus cannot be achieved, he believes that ICANN should prohibit the use of the term as hopelessly confused and confusing unless it is carefully qualified in each instance of use. JCK suggests that if "variant" ends up being defined, it would be wise to try to confine its use to relationships that result from inherent properties of writing systems, scripts, orthography, or encoding design decisions. By contrast, "visual confusion" is always largely a matter of perception and often depends on rendering and typeface decisions as well.

In summary, JCK encourages ICANN to use great care in permitting entitlement to multiple names in the root, independent of whether those labels are delegated as TLDs or handled through some aliasing mechanism. It may be safe to do so when a given string can have, at most, exactly one alternative to be considered as a related name and sufficient administrative precautions can be guaranteed to prevent causing, rather than reducing, confusion. For the other cases, JCK suggests that ICANN should consider whether the best interests of the Internet call for non-DNS mechanisms or helping users adapt to one (and only one) way of doing things with no "equivalences", just as users have adapted to lack of DNS-based equivalences in the ASCII/LDH world.

2. What Characters are in a Script?

JCK notes that several of the reports point out that adequate use of a script requires that one or more characters from what Unicode characterizes as the "Common" and/or "Inherited" scripts be used along with characters identified with the relevant scripts. He notes that permitting these characters violates the existing ICANN principle prohibiting labels that contain characters from more than one script. He suggests that unlimited use of "Common" or "Inherited" characters together with a particular script could easily lead to other problems that none of the teams have addressed. JCK believes that the only rational approach to the problem will require ICANN tables of valid characters associated with each script.

3. Specific Issues and Further Study

JCK believes it would be helpful to focus the issues by having the ICANN community respond to every suggestion about more work by asking if it is appropriate to block any IDN TLD applications for that script until

the issue can be resolved. JCK also believes that this approach might provide the necessary focus and encouragement for getting consensus on answers where they are available, reaching agreement that some issues are not important enough to affect variant (or other) choices, and evolving appropriate strategies for the other cases.

4. An Even Higher Level Issue

In the interest of satisfactory user experiences and the stability and predictability of the DNS, JCK expresses hope that as ICANN and the broader community consider how to respond to the issues and requirements identified in these reports, the consideration process does not start and end with the assumption that the only possible solutions lie in either forcing something onto the DNS (including tricking the DNS into doing something that isn't a natural part of its design) or on the user. There are roles for both of those approaches, but there are also other options.

Summary of Comments from the ALAC

The ALAC acknowledges the extraordinary work done by the IDN Variant Issues Project case study teams and recognizes the significance and importance that IDNs play in enhancing diversity, preserving language, and democratizing access. The ALAC 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. 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. The ALAC notes that such distinction and explanation would provide important and useful context for the general community to provide comments to the work of the VIP case study teams. In addition, the ALAC advises the 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 Greek Case Study Team Response to Public Comments

1. Response to comments made by Jimmy Kyriannis (JK)

The Greek Case Study Team would like to thank Mr. Jimmy Kyriannis for his comment. The question that he raises had also puzzled the members of the Team. By coincidence, the example of “Αθήνα” and “Αθηνά” that he uses was also used by the member of the Team who made the presentation of the Greek Case Study Team Report in Dakar (24 October 2011). In the Team's report two proposals are submitted: one with variants (variant proposal) and one without variants (small characters proposal). However, the majority of the members of the Team had the opinion that this could lead to user confusion and to security problems like phishing, because these two strings (and any other pair of strings consisting of the same characters, like “πότε” “ποτέ”) look very much alike. For this reason, the Team recommends that domain names with alternative positioning of the Tonos accent mark should not be allowed. This implementation will also reassure the protection of trademark holders from phishing and string confusion.

The Team admits that this implementation is not 100% appropriate for cases like the one described by Mr. Kyriannis, but, due to the scope of the IDN VIP Project (i.e. to avoid solutions that create security and stability issues), the choice of the Team was to recommend what it is stated in its Report and exclude alternative positions of the Tonos accent mark for both the recommended solutions.

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

Mr. John C Klensin recommends that the Greek Case Study Team Report *“...simply be rejected as unresponsive to the scope and intent of the [TLD] Variant Issues Project”*. The Greek Case Study Team’s reference document is the one of 20th April 2011, published by ICANN with the title: *“The IDN Variant Issues Project: A Study of Issues Related to the Delegation of IDN Variant TLDs”* (without brackets). At page 5 of this document, the Scope of the Project is described (exact text in *italics*):

“[...] Excluding a variant of the TLD may disenfranchise communities that use the characters in the excluded TLD strings, while allowing the delegation of variants without carefully considering its impact could lead to inconsistent user experience as well as security and stability issues. The expected user experience if using delegated IDN variant TLDs as compare to using the related base TLD may vary from case to case [...]”

- Scope #1: ICANN’s intention is not to disenfranchise communities, but, on the contrary, to facilitate the use of the respective language on the DNS in the most realistic manner. The Team’s Report was produced in order to fulfill this ICANN’s intention regarding the Greek language and the Team’s proposals and recommendations were submitted using this rationale.
- Scope #2: ICANN sets as a first class criterion the consistency to the user experience. It is an essential criterion according to ICANN. It is needless to say that this was also the Team’s main concern, as this criterion is many times mentioned in the Report and it was the most significant evaluation factor for the Team’s proposals and recommendations.
- Scope #3: ICANN suggests that the outcome of the IDN VIP should not create security and stability issues. The Team’s recommendations introduce three variants (only), which do not affect the security and stability of the DNS. Actually, the Team, taking into account the current technological limitations, submits two proposals; one with (three) variants and one without any variants at all. But that was due to the fact that variants are difficult to be implemented at some protocols (e.g. SMTP) and not to the DNS itself.

It is a fact that: *“[...] the expected user experience ... may vary from case to case [...]”*. The Team recognizes that due to the nature of the DNS, the Greek language and its grammar cannot be implemented 100%. For this reason, the Team suggests the exclusion of the polytonic characters, the reservation of the variants of the base label TLD, essentially excluding them from registration and the obligation of the registrant to select only one form (between Dimotiki and Katharevousa) for the applied IDN TLD, if the string happens to be a real Greek word. Trying to forget on purpose that many strings depict words would lead the Team to infringe the above mentioned Scope #1.

Mr. John C Klensin notes that *“[...] there are no accented characters and no position-sensitive characters in ASCII. To “equalize the experience” would be to discard exactly those features of the Greek writing system [...] Users simply do not have expectations for TLDs; one set of conventions should be used and users trained [...]”*. In other words, Mr. John C Klensin suggests that Greek users should not expect to use correctly any TLD in their language – on the contrary, they all have to be trained to use a fake Greek language different from the one they use in the real life. But if that was the case, ICANN would not launch the IDN VIP in the first place. ICANN does realize the need to accept variants in the DNS and its main concern is how to deal with them, because: *“Language communities that use variant characters are affected by decisions about how variants are managed and implemented in new TLDs [...]”*, as it mentioned in page 4 of the document of 20th April 2011.

For this reason, the six Case Study Teams were created. Their goal is well defined also at page 4 of the above mentioned document, where it is stated that: *“[...] case studies ... are planned to identify the set of issues*

that, if resolved, may enable the delegation of IDN variant TLDs for the benefit of the respective user communities [...]”. Moreover, at page 6, the (8) tasks of the whole Project are described, but ICANN itself asks the Case Study Teams to focus on questions (1) and (2) only, i.e.:

1. “Create a commonly understood glossary of terms and ensure that such terms are accurate and vetted with appropriate technical and linguistic communities and are used consistently throughout the project to improve the dialogue among participants,
2. Identify the set of challenges of working with IDN variant TLDs that are based on a) linguistic accuracy, b) technical feasibility and accuracy, c) usability, d) accessibility, and e) security and stability.

[...] Tasks (3) through (8) will be the focus of follow-on projects by ICANN policy development, implementation guidelines produced by ICANN staff in consultation with the community, and relevant work by IETF, and other interested organizations”.

At page 6 of the reference document it is stated that “[...] The IDN Variant Issues Project goal is **to identify the “problem statement”** [...] (and) Groups should **explain how they expect IDN variant TLDs to work from the perspective of how the users use and interact with domains** [...]”. It is easily seen that the criterion of the consistency to the user experience is stressed again by ICANN.

The Greek Case Study Team identified and examined the problematic issues and thus covered the requirements of the Project: Monotonic vs. Polytonic characters, the existence of Tonos (or not) on a vowel, the issue of the final sigma and its consequences if it is not handled in the proper way, homographs, Katharevousa vs. Dimotiki. In order to contribute to the “security and stability” question, the Team submitted two proposals, together with its recommendations, as it is already mentioned before.

For the completeness of the Team’s report, issues like “Greeklish” and the “upper-case characters” had to be reported too. “Greeklish” is a phenomenon that does exist among the Greek internet users, especially of young generations, but, in addition, even Ministries still use as their domains the “Greeklish” translation of their original Greek name, due to the inability of the DNS (until 2005) to accept and handle the Greek characters. The Team recognizes that this issue is beyond the scope of the Project, but we believe that it should be mentioned.

Regarding the “upper-case characters” issue, the Greek Team knows very well (even better than other Teams and many people in the ICANN environment) that “upper-case characters” are prohibited by IDNA2008, despite the fact that ICANN itself uses the “upper-case characters” in examining the confusability of IDN strings e.g. when examining the Greek IDN ccTLD application, which is still frozen due to this exact reason. The Greek Team had to take into account that same rules apply for ccTLDs and gTLDs and “upper-case characters” rules had to be studied. The comment of Mr. John C Klensin actually strengthens the Greek position about upper-case characters and confusability and the Team would like to thank him for that.

The “upper-case characters” issue was examined in detail because it is very common for a user (not only a Greek one) to type a domain name in ASCII with “caps lock” on and still expect to obtain the desirable result. The same can happen to a Greek user and although Mr. John C Klensin’s perception is that he “[...] will rapidly discover that doesn’t work [...]”, this is not true. What one does not know is how and if the application will convert the upper-case characters to lower-case characters, because the IDNA2008 protocol does not deal with this issues anymore.

The Team believes that this “user experience” can be easily fulfilled in Greek TLDs too, if the Team’s recommendations were to be implemented. To achieve this goal, it has to be taken into account that in the Greek language upper-case characters are not accented and, since some applications may transform an “upper-case” string into a “lower-case” string according to IDNA2003 or in any other way, the proposal of introducing a variant of the string stripped of accent marks and final sigma was necessary. Mr. John C Klensin agrees with this Team’s proposal by stating in his “ICANN VIP Project: Overview” that “[...] the Greek Tonos problem [...] could perhaps be solved by entering (registering) only the Tonos-containing form into the database but permitting an undecorated lookup to match it [...]”.

At page 7 of the reference document of 20th April 2011 ICANN suggests that “[...] case study will be undertaken to focus on the known situations [...] will concentrate on specific issues that are relevant to their communities [...]”, “[...] should avoid describing solutions, but rather focus on the problem statement [...]” and “[...] should produce a clear description of scope and use cases, which should make it easier to assess whether potential solutions will provide satisfactory results [...]”. Taking into account the limited number of comments received by Greek users during the Public Consultation Period, the Team is of the opinion that its Report covers appropriately the “known situations”.

Despite Mr. John C Klensin’s unquestionable experience in the DNS, the Team’s opinion is that his comments are surprisingly weak, unnecessarily arrogant and hostile and based on his own perception of what the IDN Variants report should include rather than on what is requested in the ICANN reference documents. Accepting his recommendation to reject “*as unresponsive to the scope and intent*” the Greek Team’s report would only damage the ICANN Variant Issues Project as laid out by ICANN.

3. Response to statement made by ALAC

The Greek Case Study Team would like to thank ALAC for its statement and to assure that the Report produced included the desirable level of consensus within the Greek language community. The recommendations made by the Team are already implemented by the Registry of [.gr] Domain Names for the handling of the Greek characters at the second level under [.gr] since 2005 and everything is working smoothly so far. For that reason, the Team also submitted these recommendations to the IDN VIP Project, but, nevertheless, the Team is willing to contribute to proposals and solutions that will facilitate the rights of consumers to express themselves in the language of their choice.