

NCSG PUBLIC COMMENT

Additional Reference Label Generation Rules and Related Updates

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23 June 2026**

About NCSG

NCSG represents the interests of non-commercial domain name registrants and Internet end users in the development of Domain Name System policy within the Generic Names Supporting Organization (GNSO). Through its individual and organizational members from more than 160 countries, NCSG contributes perspectives from civil society, academia, technical experts, and Internet users worldwide. NCSG supports policies that promote an open, secure, stable, interoperable, and globally inclusive Internet.

Introduction

NCSG supports the ongoing development and refinement of Second-Level Reference Label Generation Rules. The ability of Internet users to access domain names in their native scripts and languages is fundamental to a multilingual and inclusive Internet. The publication of new Reference LGRs for the Javanese and Unified Canadian Aboriginal Syllabics (UCAS) scripts, together with updates to existing Arabic, Inuktitut, Japanese, and Latin Reference LGRs, represents an important step toward expanding linguistic representation while maintaining DNS security and stability.

Reference LGRs play a critical role in ensuring consistency, predictability, and transparency in the review of IDN tables submitted by registries. NCSG therefore views this work as an important component of broader efforts to promote Universal Acceptance and meaningful participation in the digital ecosystem by speakers of diverse languages and scripts.

NCSG supports the publication of the proposed new and updated Reference LGRs. We encourage ICANN org to continue engaging directly with relevant linguistic communities, maintain transparency regarding the rationale for additions and modifications, and ensure that future updates remain guided by security, stability, and inclusivity considerations. NCSG also encourages continued coordination between Reference LGR development and Universal Acceptance initiatives to maximize the practical benefits of multilingual domain names for end users.

NCSG Position and Recommendations

1. Support for Inclusivity of Underrepresented Communities

2. Prioritizing Meaningful Access over Availability

NCSG recommends that ICANN prioritize "meaningful access" rather than mere technical availability. It is essential that users can seamlessly discover, register, and utilize domain names in their native scripts across every layer of the Internet infrastructure, including registries, registrars, and end-user applications. This objective is inextricably linked to our commitment to Universal Acceptance, ensuring that linguistic support translate into practical usability for all global citizens.

NCSG explicitly welcomes the inclusion of support for UCAS, Algonquian, Javanese, and Pegon. This represents a significant milestone toward global inclusivity, particularly for historically underrepresented language communities who can now better reflect their cultural identities within the DNS.

The DNS should continue evolving to accommodate the diversity of Internet users worldwide while maintaining the technical safeguards necessary for secure and stable operation.

3. Continued Community-Led Development

NCSG welcomes ICANN org's approach of consulting relevant language and script communities, such as those for the Javanese, Pegon, and Algonquian languages, during the development of Reference LGRs. Such participation helps ensure that technical rules accurately reflect linguistic realities and community needs.

Future development and revision of Reference LGRs should continue to rely on transparent consultation processes that meaningfully involve language experts, script communities, Indigenous communities, and other relevant stakeholders.

4. Security, Stability, and Predictability

NCSG recognizes that Reference LGRs serve an important security and stability function by providing consistent criteria for the review of IDN tables and the management of variant labels.

As additional scripts and languages are incorporated, ICANN should continue applying conservative and well-documented approaches to variant management and character inclusion. Maintaining transparency regarding the rationale for additions, cross-script variants, and rule changes helps strengthen community confidence in the process.

5. Alignment with Universal Acceptance

NCSG encourages continued coordination between Reference LGR development and Universal Acceptance efforts. The benefits of supporting additional scripts within the DNS can only be fully realized when domain names and email addresses function consistently across applications, devices, and services.

Advancing multilingual domain name support should therefore remain closely linked to broader efforts that improve acceptance and usability throughout the Internet ecosystem.

6. Transparency and Accountability of the LGR Process

NCSG recommends that ICANN enhance the transparency and accountability of the LGR development process. This should include publishing detailed justifications for all character additions or modifications and providing accessible documentation regarding community requests. Furthermore, ICANN should establish clearer, more accessible pathways to enable future linguistic communities to participate effectively in the process.

7. Monitoring Real-World Impact and Adoption

We recommend that ICANN establish a formal mechanism to monitor the real-world impact of these Reference LGRs. This monitoring should specifically evaluate adoption rates among registries, the tangible benefits delivered to end-users, and the identification of any persistent barriers that may be hindering the uptake of supported scripts.

NCSG notes that the publication of new and updated Reference LGRs is only the first step toward meaningful multilingual participation in the DNS. The benefits of these developments will depend on awareness, implementation, and usability. ICANN should therefore work with affected linguistic and cultural communities, registries, registrars, and Universal Acceptance stakeholders to ensure that newly supported scripts and characters can be effectively used in practice. Particular attention should be given to Indigenous, minority-language, and historically underrepresented communities whose participation in the DNS may otherwise remain limited despite the availability of technical support.

NCSG encourages ICANN to improve the visibility and accessibility of the Reference LGR development and change-request process. The recent additions supporting Pegon, Algonquian languages, Javanese script, and Unified Canadian Aboriginal Syllabics demonstrate that community participation can successfully shape these resources. Greater transparency and outreach may help other linguistic communities understand how to engage in future updates.

Conclusion

NCSG supports the publication of the proposed new and updated Second-Level Reference LGRs. We encourage ICANN org to continue its collaborative engagement with linguistic communities, maintain transparency in future revisions, and ensure that security, stability, and inclusivity remain central considerations in the ongoing development of Reference LGRs. We further encourage continued alignment between Reference LGR work and Universal Acceptance initiatives to support a truly multilingual Internet.