

Individual Public Comment on the Second-Level Reference Label Generation Rules — LGRs

Public Comment Proceeding: Second-Level Reference Label Generation Rules — LGRs

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1. Introduction

I welcome the opportunity to provide an individual comment on the new and updated Second-Level Reference Label Generation Rules — LGRs — released by ICANN org for Public Comment.

Internationalized Domain Names — IDNs — are essential to making the Domain Name System more inclusive, multilingual, and accessible to communities that use scripts and languages beyond the traditional ASCII-based domain name environment. The continued development of Reference LGRs at the second level is therefore important not only as a technical matter, but also as a matter of digital inclusion, linguistic diversity, and end-user trust.

2. General Support for the New and Updated Reference LGRs

I support the publication of the new and updated Second-Level Reference LGRs, subject to any specific technical concerns that may be raised by the relevant language and script experts.

The proceeding includes two new Reference LGRs for the **Javanese script** and **Unified Canadian Aboriginal Syllabics — UCAS — script**. The document indicates that both are newly added and based on community-developed supporting documents.

I also note the proposed updates to existing Reference LGRs, including the Arabic script, Inuktitut language, Japanese language, Japanese script, Latin script, and Latin script Full Variant Reference LGRs. These include additions to support the Pegon writing system in Indonesia, Algonquian languages in Canada, additional cross-script variants, and alignment with RZ-LGR-6 in the case of Japanese.

These changes appear to be consistent with the broader goal of improving IDN support across diverse linguistic and script communities.

3. Importance of Linguistic Inclusion

I particularly welcome the addition of Reference LGRs that support communities whose scripts and languages have historically been less visible in the global DNS.

The inclusion of Javanese and UCAS is significant because it recognizes that meaningful participation in the Internet requires more than access to infrastructure. It also requires the ability to use language and writing systems that reflect the identity, culture, and communication practices of real communities.

In this regard, Reference LGRs contribute to a more inclusive Internet by helping ensure that IDN implementation is not limited to the most widely used scripts or dominant languages.

4. End-User Trust and Security

While I support the continued expansion of IDNs, I also encourage ICANN org to continue placing strong emphasis on end-user trust, security, and predictability.

Second-level Reference LGRs can affect how users recognize, interpret, and trust domain names. This is especially important where variant labels, cross-script variants, or visually similar characters may create confusion or increase the risk of misuse.

For that reason, I encourage ICANN org to ensure that each Reference LGR clearly explains:

1. The rationale for newly added code points.
2. The relevant language or script communities affected.
3. The treatment of variant labels.
4. Any cross-script variant relationships.
5. Potential user-confusion considerations.
6. The practical implications for registries, registrants, and end users.

The updates involving Inuktitut and the Latin Full Variant Reference LGR are especially relevant in this regard because they include additional cross-script variant considerations.

5. Accessibility of Explanatory Materials

I also encourage ICANN org to provide short, accessible summaries alongside the technical HTML and XML materials.

While the technical LGR files are necessary for implementation and expert review, many affected users, registrants, civil society participants, and language community members may not have the technical background to interpret XML or formal LGR documentation.

Plain-language summaries would help explain:

- What each Reference LGR covers.
- What has changed from the previous version.

- Which communities or languages may be affected.
- Whether variant or blocked-label implications may arise.
- How the Reference LGR may affect registries, registrants, and end users.

This would strengthen transparency and make the Public Comment process more meaningful for non-specialist participants.

6. Recommendation

I support the publication of the new and updated Second-Level Reference LGRs, provided that ICANN org continues to:

- Ground LGR development in consultation with relevant language and script communities.
- Maintain careful review of variant relationships and potential user-confusion risks.
- Provide clear documentation for registry operators and affected communities.
- Align second-level Reference LGRs with relevant Root Zone LGR principles where appropriate.
- Make explanatory materials accessible to non-technical stakeholders.

7. Conclusion

The proposed new and updated Reference LGRs represent a positive step toward a more multilingual, inclusive, and user-centered DNS.

I support the addition of the Javanese and UCAS Reference LGRs and the updates to the Arabic, Inuktitut, Japanese, and Latin Reference LGRs. These changes appear to advance linguistic inclusion while improving technical consistency in the treatment of IDNs.

At the same time, I encourage ICANN org to continue ensuring that strong safeguards for security, stability, usability, and end-user trust accompany IDN expansion.

Subject to any specific technical concerns raised by relevant script and language experts, I support the publication of these new and updated Second-Level Reference LGRs.