

Draft Public Comment

Coalition on Digital Impact (CODI)

Re: Guidelines for Advancing Universal Acceptance (UA) Adoption

The Coalition on Digital Impact (CODI) appreciates the opportunity to comment on the “Guidelines for Advancing Universal Acceptance Adoption” draft published by ICANN’s Universal Acceptance Expert Working Group. CODI is a nonprofit organization focused on ensuring that people can access and navigate the Internet in their own language and that linguistic diversity is supported across digital systems and platforms.

Universal Acceptance (UA) is foundational to building a truly multilingual Internet. We strongly support ICANN’s continued leadership in promoting UA adoption across the technical ecosystem and commend the working group for developing a comprehensive framework spanning technical stakeholders, governments, developers, and academia.

Our comments focus on several areas where CODI believes the guidelines could be strengthened to better address application-layer barriers, developer tooling, and measurement of real-world user experience.

1. Expanding the Definition of UA-Readiness to Include Application-Layer Detection and Linkification

The draft appropriately emphasizes that UA readiness requires systems to accept, validate, store, process, and display all valid domain names and email addresses. However, in practice, a major category of failures occurs at the application and user-interface layer, particularly in how software detects, parses, and linkifies domain names and email addresses.

Across many web platforms and applications—including messaging platforms, content management systems, and social networks—valid internationalized domain names (IDNs) and internationalized email addresses (EAI) are often not correctly recognized or linkified in user-generated text. These failures create a significant barrier to the usability of multilingual Internet identifiers even when lower-level infrastructure supports them.

CODI recommends that ICANN expand the operational definition of UA-readiness to explicitly include:

- Correct detection and parsing of domain names and email addresses in application interfaces
- Proper linkification of IDNs and EAI in user-generated content
- Compatibility with multilingual identifiers in authentication systems, messaging tools, and content platforms

Addressing these issues is essential to ensuring that UA works end-to-end from infrastructure to user experience.

2. Strengthening Measurement of UA Adoption and User Experience

CODI strongly supports the development of indicators to measure UA adoption progress. However, current measurement frameworks may not fully capture the real-world user experience of multilingual Internet identifiers.

We recommend expanding measurement efforts to include:

Application-layer indicators

- Percentage of major applications and platforms that support IDNs and EAI in user interfaces
- Support for multilingual identifiers in authentication and account registration systems

Developer ecosystem indicators

- Availability of UA-compliant libraries and frameworks
- Adoption of UA test suites in developer workflows

User experience indicators

- End-to-end success rates for completing online workflows using internationalized identifiers

- Real-world testing across common application categories (e-commerce, social media, messaging platforms)

In addition, CODI recommends that ICANN develop a **public-facing tracking and testing platform for UA readiness at the application layer**, modeled on widely used developer tools such as *caniuse.com*.

Such a platform would provide a clear, continuously updated compatibility matrix showing how different platforms, applications, and libraries support key UA behaviors, including detection, parsing, and linkification of domain names and email addresses.

A centralized, developer-friendly reference of this kind would:

- Make gaps in UA support visible and measurable
- Provide actionable insights for developers and vendors
- Create ecosystem-level accountability and incentives for improvement
- Accelerate adoption by lowering the barrier to testing and validation

CODI encourages ICANN, in collaboration with technical partners, to take a leadership role in convening stakeholders and advancing the development of such a tool as part of its broader UA measurement strategy.

3. Strengthening the Focus on Developer Tooling and Reference Implementations

The guidelines rightly emphasize outreach to software developers and technical professionals. However, awareness alone will not solve UA adoption challenges. Developers frequently need practical tooling, libraries, and testing frameworks to implement UA support effectively.

CODI recommends that ICANN prioritize the development or coordination of:

- Reference libraries for IDN and EAI validation and parsing
- UA-compliant linkification and identifier-detection tools
- Automated UA testing frameworks for integration into CI/CD pipelines
- Developer-facing implementation guides for common programming languages and frameworks

Providing such tooling will significantly lower the implementation burden for developers and help move UA adoption from awareness to deployment.

4. Expanding Priorities for Open-Source Ecosystem Engagement

The draft appropriately highlights the importance of engaging open-source communities. We support the focus on foundational tools and widely used applications.

However, we recommend that ICANN explicitly include identifier parsing, validation, and linkification libraries among the core open-source components prioritized for UA support.

Many widely used open-source libraries that detect URLs, domain names, and email addresses do not yet fully support internationalized identifiers. As a result, software applications built on these libraries may inadvertently reject or fail to recognize valid identifiers.

Improving UA support in widely used open-source parsing libraries could create significant downstream improvements across the software ecosystem.

5. Encouraging UA Support Through Default Configuration in Hosting Platforms

The guidelines appropriately highlight the role of hosting providers and Internet service providers in enabling UA.

In addition to awareness and outreach, CODI recommends that ICANN encourage UA adoption through default-enabled support in hosting platforms and control panels. Many hosting environments rely on standardized software stacks and administrative tools (such as control panels, mail servers, and web server configurations).

ICANN should work with software maintainers and hosting providers to ensure that UA support is integrated into default configurations and installation templates wherever possible.

6. Integrating UA Into Digital Public Infrastructure and Procurement Policies

The draft highlights the importance of engaging governments and public-sector institutions to promote UA adoption. CODI strongly supports this approach.

Governments increasingly rely on digital public infrastructure to deliver services, and ensuring that these systems support multilingual identifiers is essential for inclusive access.

We recommend that ICANN encourage governments to:

- Include UA readiness requirements in public procurement standards for digital systems
- Support domain names and email addresses in local languages for public services
- Integrate UA into national digital transformation strategies and digital inclusion initiatives
- Work with the GAC to explore methods to integrate UA readiness policies in procurement systems

7. Supporting Research and Case Studies on UA Adoption

The guidelines note the importance of case studies and knowledge sharing. CODI strongly supports this approach and encourages ICANN to facilitate the development of shared repositories of real-world implementation experiences.

Documenting successful implementations and lessons learned can significantly accelerate UA adoption by helping developers and organizations understand practical solutions to common challenges.

Conclusion

CODI strongly supports ICANN's ongoing leadership in advancing Universal Acceptance and welcomes the comprehensive approach outlined in the draft guidelines. Ensuring that all valid domain names and email addresses function seamlessly across the Internet is essential to building a multilingual and inclusive digital ecosystem.

Strengthening the guidelines to address application-layer challenges, developer tooling, and end-to-end user experience will help ensure that UA adoption translates into meaningful improvements in how people interact with the Internet in their own languages.

We look forward to continued collaboration with ICANN and the broader community to advance these goals.

Submitted by:

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