

NCSG PUBLIC COMMENT

Draft Guidelines for Advancing UA Adoption

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ICANN public comment proceeding

About NCSG

NCSG represents the interests of non-commercial domain name registrants and end users in formulating Domain Name System policy within the Generic Names Supporting Organization. We are proud to have individual and organizational members in over 160 countries, and as a network of academics, Internet end users and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999, we have facilitated global academic and civil society engagement in support of [ICANN's mission](#), stimulating an informed citizenry and building understanding of relevant DNS policy issues.

Gratitude

NCSG thanks [ICANN org](#), the Universal Acceptance Expert Working Group and all contributors to the draft for opening this consultation. The [proceeding notice](#) appropriately asks the community to identify both substantive gaps and implementation priorities. That framing is important because the [UA EWG Charter](#) makes clear that the group developed advisory guidelines for ICANN org implementation rather than binding policy recommendations.

Introduction

Universal Acceptance is not a peripheral issue. It is a practical condition for a multilingual, interoperable and inclusive Internet in which all valid domain names and email addresses function across applications, devices and services. The [public comment notice](#) reiterates that UA remains a focus in ICANN's FY26-30 Strategic Plan and is necessary for the New gTLD Program 2026 Round. The [draft itself](#) also places UA within ICANN org's coordinating role and links adoption to consumer trust, interoperability, security and digital inclusion.

NCSG therefore supports the overall direction of the [draft guidelines](#). We welcome the recognition that UA is a whole-stack issue, that progress must be measured, and that civil society, academia, public institutions and linguistic communities all have a role to play. At the same time, the document will achieve its stated purpose only if it becomes an operational instrument with clear sequencing, public accountability and meaningful participation by affected communities.

Abstract

This comment supports adoption of the guidelines, while recommending 5 improvements. First, ICANN org should publish a sequenced implementation roadmap that identifies priority dependencies, delivery owners and review points. Second, the proposed measurement framework should be converted into a baseline assessment, a [public dashboard](#) and a periodic reporting cycle. Third, ICANN should use mission-consistent incentives, [model procurement](#)

[approaches](#) and existing technical resources to accelerate adoption without bypassing bottom-up processes. Fourth, implementation should more explicitly involve civil society, end users, minority language communities and underserved regions. Fifth, [accessibility](#), security and privacy should be treated as core UA requirements rather than secondary considerations.

NCSG Position and Arguments

1. From guidance to a sequenced implementation roadmap

NCSG agrees with the [draft's premise](#) that the guidelines should support strategic engagement, capacity development, standards alignment and measurement in a sustainable and measurable manner. We also support the [draft's recognition](#) that ICANN org will have a coordinating role, will need to prioritize the guidelines and will have to report on progress. Yet the document currently spans 10 charter questions and a very broad stakeholder universe without offering a sufficiently concrete order of execution. That creates a risk of diffusion rather than delivery.

The most important analytic contribution of the draft is its clear statement that [UA is the operational outcome of internationalization across the technology stack](#) and therefore cannot be achieved through isolated front-end fixes. NCSG believes that this insight should drive implementation sequencing. ICANN org should first identify and prioritize horizontal dependencies whose remediation unlocks multiple downstream systems and services. The [open-source section](#) already offers a strong model by highlighting core functions such as domain and email validation, support for local-language email addresses, linkification, slug handling, authentication, email transmission and spam filtering. These are high-leverage intervention points because failure at this layer propagates across large parts of the user experience.

For that reason, NCSG recommends that ICANN org publish, after completion of this public comment process and before implementation begins, a phased roadmap. A first phase should address foundational dependencies and standards uptake. A second phase should focus on high-impact deployments in registrars, hosting environments, email services and public-facing services. A third phase should focus on measurement, remediation and replication of effective practices. The roadmap should identify owners, dependencies, intended outputs and public review points. This would give practical effect to the [proceeding page's request for prioritization feedback](#) and make later updates easier to assess.

NCSG further recommends that each implementation action be mapped against existing resources so that the guidelines add coordination and scale rather than duplication. Useful building blocks already exist in the [ICANN UA Roadmap for Registry and Registrar Systems](#), [UASG 026 UA Readiness Framework](#), [UASG 004 Test Cases for UA Readiness Evaluation](#), the [UASG EAI Self-Certification Program](#) and the [UASG EAI check tool](#). The value of the present guidelines should come from prioritizing and scaling these instruments, not from creating another disconnected catalogue of recommendations.

2. From indicators to accountable measurement

NCSG strongly supports the [measurement architecture proposed in the draft](#). The text is right to call for indicators that are clear, reasonably high-level and not prohibitively costly to collect over

time. It is also right to propose a [UA reporting dashboard](#) and to organize indicators across awareness, policy support, implementation and capacity development. Particularly valuable is the identification of [end-to-end success of the end-user journey](#) as a key cross-cutting indicator.

However, the draft does not yet answer several questions that will determine whether this framework produces accountability in practice. It does not specify who will establish baselines, how data will be validated, how frequently data will be published, what methodologies will be made public, or what happens when indicators show stagnation. If ICANN org is to prioritize and implement the guidelines, it should also publish a measurement methodology, an initial baseline and a regular reporting calendar. NCSG recommends a baseline assessment within 6 months of adoption, public dashboard updates at regular intervals, a concise annual narrative report, and a light community review approximately 18 months after implementation begins.

Measurement should remain outcome-oriented. Counting awareness events or publication outputs alone is not enough. Public reporting should show whether users can successfully register, sign in, receive email, recover accounts and complete transactions using valid IDNs and EAI across real services. In addition, where data is self-reported, the relevant templates, evidentiary thresholds and caveats should be public. Reported progress should not consist only of success stories. Persistent bottlenecks and recurring failure patterns should also be disclosed. This expectation is consistent with ICANN's [accountability and transparency commitments in the Bylaws](#) and with the [draft's own emphasis on measurement as evidence-based decision-making](#).

3. Incentives and public-interest levers within ICANN's mission

NCSG notes with approval that the [public-sector section of the draft](#) explicitly recognizes that UA cannot be solved only by market forces and may require public-sector intervention. We also note the [recommendation to consider an issues report for UA adoption in registries and registrars](#), including possible incentive-based approaches. NCSG agrees that these avenues deserve serious consideration because UA failures can erode consumer trust and undermine the practical reliability of the DNS.

At the same time, NCSG considers it important to preserve the boundary between implementation guidance and formal policy development. The [UA EWG Charter](#) clearly states that the group acts in an advisory capacity and does not make policy recommendations. Any move from awareness and coordination into contractual or consensus requirements should therefore proceed through ICANN's established bottom-up processes and remain within [ICANN's mission, commitments and core values](#). That includes the Bylaws commitment to open and transparent processes, broad informed participation, accountability and respect for internationally recognized human rights within mission.

Within those parameters, there is significant room for action now. The [draft's indicator framework](#) usefully identifies procurement requirements for government systems and e-government services as a meaningful policy-support measure. NCSG recommends that ICANN org develop model UA procurement language, sample testing clauses and short implementation checklists that governments, universities, public-interest institutions and contractors can adopt voluntarily. That would convert a promising idea in the draft into a

practical demand-side instrument, while remaining transparent, non-discriminatory and mission-compatible.

For the DNS industry, ICANN should promote a visible progression model built on existing technical resources rather than relying only on awareness messaging. The [draft itself](#) recommends periodic self-assessment by registries and registrars. That work should be linked to the [ICANN UA Roadmap for registry and registrar systems](#) and the [voluntary EAI self-certification framework](#), so that operators have a concrete pathway to improvement before the community considers stronger measures.

4. Participation by civil society and affected linguistic communities

NCSG strongly supports the portions of the draft that acknowledge the roles of [civil society and At-Large structures](#), of public institutions responsible for language, education and digital services, and of [academia across multiple disciplines](#). It is also welcome that [Appendix B](#) frames UA adoption as serving a diverse and multilingual Internet and supporting participation by linguistic communities. This direction is well aligned with the [ICANN Bylaws requirement for broad, informed participation reflecting functional, geographic and cultural diversity](#).

The implementation implications of that recognition should nevertheless be strengthened. Communities most affected by UA failures are not only technical implementers. They are also users whose access to public services, education, cultural expression and economic participation may be constrained when valid domain names or email addresses fail in practice. This is particularly important for minority language communities, Indigenous language communities and underserved regions, where exclusion often results from a chain of technical and institutional barriers rather than a single software defect. UNESCO's [current multilingualism and linguistic diversity work](#) and its continued reference to the [2003 Recommendation on Multilingualism and Universal Access to Cyberspace](#) both support a multi-actor approach involving governments, civil society, academia and the private sector.

NCSG therefore recommends that ICANN treat community participation as an implementation workstream in its own right. Key materials, self-assessment templates and case-study formats should be made available at least in ICANN's official languages and designed for local adaptation. End-user testing should include community-based organizations, disability organizations, linguistic communities and At-Large structures, not only vendors and operators. Where the draft recommends a network of [25 to 100 academic hubs](#), ICANN should ensure that the selection model is geographically and linguistically balanced and does not privilege only already well-networked institutions.

5. Accessibility, security and privacy as core UA requirements

NCSG agrees with the [draft's view](#) that UA adoption can strengthen interoperability and security, and we welcome the [baseline standards section](#) referencing the IETF, Unicode and related standards bodies. Support for IDNs and EAI depends not only on front-end acceptance but also on protocols, validation logic, rendering behavior and authentication workflows. [RFC 6531](#) remains a foundational standard for internationalized email, while [Unicode Security Considerations](#) underscore the importance of confusable handling, restriction levels and appropriate alerts.

The draft is right to identify practical failure points such as [email validation, credentials, authentication and sending services](#). These are not peripheral issues. A service that accepts an internationalized address at registration but fails during sign-in, password recovery or notification delivery is not meaningfully UA-ready. NCSG therefore recommends that ICANN's implementation guidance define minimum end-to-end test journeys covering registration, login, account recovery, transactional email, support channels and administrative interfaces. Those test journeys should be reusable across sectors so that measurement becomes comparable over time.

Finally, [Appendix B](#) explicitly notes that support for accessibility tools such as screen readers was not expressly taken into consideration and would require further work. NCSG believes that this work should be incorporated into the core implementation plan rather than deferred indefinitely. Accessibility should cover screen readers, keyboard navigation, input methods on mobile devices, multilingual error messaging and compatibility with assistive technologies. Measurement must also remain privacy-preserving. ICANN should avoid any indicator design that requires unnecessary collection or retention of personal data when testing or reporting UA readiness.

Conclusion

NCSG supports the draft as an important step toward a more multilingual, inclusive and interoperable Internet. The document is strongest where it recognizes that UA is a whole-stack challenge, that progress must be measured and that public-interest actors beyond the DNS industry have an indispensable role to play.

To make the guidelines effective, ICANN should now convert them into a public implementation roadmap with clear sequencing, ownership and reporting. It should build on existing ICANN and UASG resources, use procurement and voluntary recognition to stimulate adoption, and ensure that civil society, end users and affected language communities participate in implementation and review. It should also incorporate accessibility, security and privacy as integral parts of UA readiness. NCSG urges ICANN org to publish, after considering public comments, an implementation plan and measurement methodology for community review, followed by regular public progress updates. That approach would better align the initiative with [ICANN's mission and core values](#), while helping translate broad strategic support for UA into durable operational change.

Respectfully submitted,

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