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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Draft Guidelines for Advancing UA Adoption

Preamble

On 23 February 2026, the Public Comment proceeding opened for the Draft Guidelines for Advancing UA Adoption. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group reviewed the Draft Guidelines for Advancing UA Adoption and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

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Ratification Record

On 23 February 2026, the Public Comment proceeding opened for the Draft Guidelines for Advancing UA Adoption. On 25 March 2026, the Consolidated Policy Working Group (CPWG) discussed the comments for an ALAC statement. The CPWG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. David Inem, Edmon Chung, Hadia Elminiawi, Murray McKercher, Nkoro Nkoro, Om Prakash Sharma, Raymond Mamattah, and Satish Babu volunteered to draft the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 1 April 2026, a draft statement was shared with the CPWG for review and input. On 8 April 2026, the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 13 April 2026, staff confirmed the online vote resulted in the ALAC endorsing the statement with 11 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 73% of ALAC

members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Adebunmi Akinbo, Aziz Hilali, Claire Craig, Eunice Alejandra Perez Coello, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu. You may view the results here:

The ALAC has been asked to vote on the ALAC Statement on Draft Guidelines for Advancing UA Adoption			
Total Voters:15			
Choice 🗳️	View Raw Votes 🗳️	Votes	Percentage 🗳️
Yes		11	100.00%
No		0	0.00%
Abstain		0	0.00%

ALAC and At-Large Community Comments

The At-Large Advisory Committee (ALAC) and the At-Large community appreciate the opportunity to provide input on the Draft Guidelines for Advancing UA Adoption. The At-Large community welcomes this draft and supports its overall direction.

Universal Acceptance (UA) provides significant advantages and opportunities to end-users and their communities as they seek to establish their digital identities. From an end-user perspective, Universal Acceptance is not only a technical issue, but a matter of usability, fairness, trust, and digital inclusion, and is an important step towards the multilingual Internet. The absence of UA creates substantial global challenges for end-users, including indigenous and minority-language communities seeking to secure a place for their scripts in the DNS equivalent to that of established languages. In some regions including South Asia and Southeast Asia, the promise of the next billion connected users will be fully realized only through ensuring Universal Acceptance for their scripts.

We believe that the Draft Guidelines go a long way to support and encourage the adoption of UA, and would like to congratulate the Expert Working Group (EWG) for their efforts.

We have the following comments, which are suggestions meant to enhance the Draft Guidelines.

A. Alignment with Charter

1. The Charter mentions the multilingual Internet and Digital Inclusion, which directly deal with end-users. However, in the Draft, end-user perspectives are largely confined to supply-side actors such as developers and industry.

2. The Charter explicitly asks for developing measures to gauge UA progress (Page 1, last-but-one paragraph). The Draft mentions measurement, but does not define concrete indicators. We understand that the EWG may not be best suited to define these indicators, but wish to point out that the EWG could identify or recommend the appropriate agency or group responsible for the development and institutionalization of these indicators.

3. The Charter clearly states that the EWG should guide ICANN Org's work and not create community policy (Page 1, last line). However, some draft recommendations may go beyond an advisory role (e.g., Guideline 4(d) mentions policy and regulatory developments where *governments* could mandate UA requirements). While the EWG is clearly within scope to discuss engagement with governments, IGOs, and the public sector, language that appears to endorse or promote governmental mandates risks going beyond the Charter's advisory role.

B. Possible Additional Recommendations

1. From an ALAC/At-Large perspective, it would be valuable to frame UA in terms of end-user-centric goals, such as:

- The ability to register and use email addresses in local scripts
- The ability to sign up for services using IDN email
- Improved accessibility for non-Latin script users
- A reduction of digital exclusion

In addition, demonstration of EAI within organizational email lists - including but not limited to government - would help to showcase end-user adoption of UA.

2. The role of ALSes and other civil society organizations (such as ISOC Chapters) could be incorporated. For instance, these could promote local-language email adoption, test UA readiness, or explore user experiences. They could also help in motivating technology companies as well as Governments to treat UA as a priority.

3. The consumer trust dimension could be strengthened, with guidance such as "Lack of UA support leads to failed registrations, rejected email addresses, and broken forms, thereby undermining trust in Internet services for users of non-Latin scripts." In particular, Governments have a role in ensuring consumer trust remains a priority.

4. Finally, the multilingual Internet (already mentioned in the report) could be better framed by connecting it to accessibility, rights and inclusion, highlighting that UA enables minority and indigenous languages to flourish, and that it aids the move towards linguistic equality. Governments as well as international organizations have an important role to play in upholding these rights.

C. Other comments

1. There is significant variation in the level of detail. For instance, Open Source tool prioritization and standards lists are well detailed, while others such as end-user outcomes or measurement are less developed.

2. The EWG could consider a UA Adoption Maturity Model, such as:

Level 1 : Awareness, Level 2: Partial Support, Level 3: Full UA Readiness and Level 4: Ecosystem Integration. This would make measurement and progress tracking easier.

3. Metrics should be identified and, where feasible, standardized. Possible metrics, including those identified by previous UA studies, should be proposed for adoption where possible. These include, for instance, the % of websites accepting IDN emails, % of email providers supporting EAI, and UA readiness of major platforms. Other metrics such as a list of UA-ready registries and registrars may help in incentivizing UA adoption and rewarding early adopters.

D. Syntax and style

1. Free/Open Source Software (FOSS) has been mentioned as "open-source", which is non-standard, and creates significant problems while searching for "open source". It would be good to use terms consistently in the document. Where Free and Open Source Software (FOSS) is intended, it should be mentioned explicitly in order to avoid conceptual ambiguity.

2. Since the EWG is advisory in nature, phrases such as "ICANN should..." are best avoided (maybe "ICANN Org may consider...")

3. Abbreviations need explanations at first use (footnotes and/or a glossary)

E. Sustainability and Institutionalization

While the Draft Guidelines are meant for the 2025-30 timeline, the EWG could consider suggesting measures to ensure long-term sustainability and institutionalization of UA.

Overall, the At-Large community supports the draft and encourages ICANN org to finalize it with a stronger end-user emphasis. In practical terms, this means prioritizing the most user-visible failures, measuring real-world usability across the full user journey, strengthening transparency around implementation progress, and explicitly addressing accessibility gaps. Doing so will better align UA implementation with the global public interest and with ICANN's responsibility to help ensure that the Internet works for all users, in all languages and scripts.