

ICANN Business Constituency (BC) Comment on Han Script Single Character IDN Generic Top-Level Domain 16-Aug-2024

This document provides input from the ICANN Business Constituency (BC), from the perspective of business users and registrants. We advocate for ICANN policy that:

- 1. promotes end-user confidence because it is a safe place to conduct business
- 2. is competitive in the supply of registry and registrar and related services
- 3. is technically stable, secure and reliable.

On 12-Mar-2024¹, the BC said this about single character Han (Chinese Japanese Korean) script in the subsequent round as part of our comments on Phase 1 EPDP on IDNs:

"On the issue of single character Han (Chinese Japanese Korean) script in the subsequent round, BC holds its neutral position but strongly urges the Board to call for a cross-community consultation on this issue prior to making any decision. Proper policy consultation with the ccNSO and the GAC is essential as hundreds of single-character Han scripts are used as abbreviations of country, territory, and geographic names in daily life. For example, "光" is a Han-script for "Rice" in Chinese and Japanese, or an abbreviation of "America" in Japanese. At this point, BC believes that an immediate examination of the Draft language of Geographic Names in the new AGB should take place. The cross-community consultation should help evaluate whether the current objection process is sufficiently enough, or if a prohibitive list of single character Han script.... is a workable approach. "

The BC continues to advocate the above position. We carefully read the Proposed Han Script Single Character gTLD Considerations², and we are somewhat confused about the community's role in this process. ICANN.Org's proposal says:

https://www.icann.org/en/system/files/files/proposed-han-script-single-character-gtld-considerations-2 7jun24-en.pdf

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https://cbu.memberclicks.net/assets/docs/positions-statements/2024/2024 03March 12 BC%20comment%20on%20IDN%20EPDP%20Phase%201%20final%20report.pdf

"... Based on the inputs from the Chinese, Japanese, and Korean Script Generation Panels, no further analysis is required. So, ICANN org is able to move forward with implementing the policy recommendations regarding the single character IDN gTLDs in the Han script"

What exactly does ICANN org need our comments for at this point, if "no further analysis is required"?

What is the proposed implementation plan? For example:

- Does ICANN org believe that taking advice from the GAC, ccNSO, and ALAC and evaluating if a prohibitive list of single character Han script is a workable approach? If ICANN Org does not believe so, then what is ICANN org's plan on addressing Han script single-character country and territory names and other geopolitical sensitive names?
- What is the ICANN org's expectation on the number of applications for Han script single character TLD?
- Some members of BC also raised concern on potential confusion among single-character and two-character scripts TLD which would require extensive case-by-case or contextual analysis in the string similarity review process. Such a process could be time and cost consuming, and eventually put the whole application process at a higher risk.

The BC does not believe the string similarity review or the community objection process are sufficient in confusions related to geographic names like the example we provided during our comment on Phase 1 EPDP on IDNs. We believe ICANN Org should still seek community consultation on this issue. At the very least, ICANN Org should arrange for the CJK GPs to sit together and develop a prohibitive list and/or reach consensus regarding strings that may be confused with geographic names.

The BC also believes that SSAC's SAC052 advisory from 2012 might be overcome by events, and SSAC should be asked for updated advice regarding single-character IDNs.

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This comment was drafted by Ching Chiao and Asteway Negash. It was approved in accord with our charter.