



20 September 2026

Comment to: [Report of the Technical Study Group: gTLD Integrations with Alternative Naming Systems](#)

Management Summary

A common technical baseline guiding gTLD integrations with alternative naming systems could reduce repetitive review, give registry operators greater certainty, and avoid marketplace confusion and risk to DNS security or stability.

The presently offered .ART integration of DNS and alternative naming systems (i.e., Web2 and Web3 names) will serve as a useful example as this discussion evolves.

The Report strays into areas reserved for either the ICANN policy development process or ICANN-gTLD negotiation. There are alternative mechanisms to some recommendations that might result in better outcomes vis-à-vis the goals of the report. There should be additional public discussion before an implementation model is developed to test the recommendations.

Generally

The .ART registry supports innovation by registry operators and recognizes the potential value of services that connect DNS names with other naming or application systems. .ART appreciates the work of the Technical Study Group and supports ICANN's effort to create a predictable evaluation process for registry operators that propose to integrate a gTLD with an alternative naming system (also known as Web2-Web3 integration).

A common technical baseline could reduce repetitive review, avoid unnecessary RSEP expense and give registry operators greater certainty regarding the information needed to demonstrate that a proposed service will not create marketplace confusion or a material risk to DNS security or stability.

Such a baseline should identify the information and evidence a registry operator must provide when it affirmatively proposes this type of Registry Service. However, the TSG Report should not establish a mandatory operating model for all registries or create obligations where the ends might be accomplished in different ways.

.ART Implementation

.ART implemented such a Web2-Web3 integration service in 2023 after proposing the integration details to ICANN and receiving ICANN's go-ahead (without requesting an RSEP).

- As the TSG report recommends, the .ART system limits each second-level domain in the DNS and its companion in the alternate naming system to only one controller (one registrant).
- If a DNS registrant wished to claim a Web3 name, they would validate their eligibility through the insertion of a txt record in the Web2 DNS. Only then could they claim the matching Web3 name.

- It matters not if the DNS or alternate naming system name is registered first (with the caveat that if the registrant starts on the Web3 side, they can only claim a Web3 name for an unregistered matching DNS name).
 - If someone starts with registering a Web3 domain that's operated by .ART, then .ART registers the matching DNS name. (The cost the registry incurs in registering the Web2 name is built into the cost of registering the Web3 name.)
 - No one can use that registered DNS domain, and only the person who has registered the Web3 matching domain could take possession of and start using the DNS name, should they desire to do so.
 - At the point when the Web3 user takes possession of the corresponding DNS .ART name, they are required to provide DNS registration data in accordance with the RDAP.
- The .ART Use Policy provides that if the DNS name expires, or is forfeited due to DNS abuse or rights infringement, the registrant also forfeits control over the alternate naming system (Web3) name.

In brief, the .ART implementation sought to and did implement the baseline safeguards now recommended by the TSG.

In addition, .ART's experience in this area includes U.S. Patent (US 12,652,182 B2) for developing a system for managing domain registrations that are configured to connect to a blockchain wallets running on a third-party (e.g., registrant) devices.

Importantly, .ART believes this discussion could benefit from the experiences of those that have developed and implemented integration models. While the TSG was not permitted the time to do this, the ensuing community discussion that weighs the policy outcomes of different requirements, should.

Broader Discussion is Required

In certain instances, the TSG Report veers into recommendations more suitable for ICANN-RySG negotiation, or potentially the jurisdiction of ICANN's bottom-up, multistakeholder, transparent processes. There are alternatives to some of the recommendations, which might or might not have better policy outcomes for the stability and security of naming systems.

The Initial Report addresses or assumes requirements for alternate naming systems concerning:

- registration of Web3 names through the SRS and registrars;
- registration data requirements, including RDAP extensions;
- application of Consensus Policies to Web3 names not activated in the DNS such as Rights Protection Mechanisms; and
- DNS withholding mechanisms such as name reservation.

In one example, in cases where a controller registers an alternative system name but not its DNS equivalent (and both systems are controlled by a Registry Operator), the Report appears to require that the Registry Operator must extend existing protocols (EPP, RDAP) to support alternative naming systems

and ensure data consistency.¹ This seemingly extends ICANN's remit and effectively amends the Registration Agreement, which cannot be done absent broader discussion.

In any case, this new registration data requirement:

- can be accomplished by alternate means, and
- might result in confusion in the marketplace or consequences deleterious to the stability and security of naming systems described below.

Alternative naming systems generally do not require forms of registration data similar to RDAP; anonymity is a feature of these systems. The requirement to provide that data in a scenario where only an alternative system name is registered will discourage use of the "DNS-adjacent" system and encourage use of other systems where protection of users is less of a concern.

Therefore, policy outcomes must be appropriately considered. The issues posed in this and other recommendations specified in the report would benefit from (and ICANN Bylaws require) a multistakeholder discussion of desired policy outcomes and a debate on how to achieve them.

The final report should distinguish among RDAP, RDDS, RDRS and the underlying registration-data obligations. It should not assume that all data used by an alternative naming system is registration data that must be collected, maintained, published or disclosed by the RO.

The report should identify as unresolved for later negotiation or community discussion:

- what data must be collected by a registry for an alternative-only name;
- whether the data is maintained by the registry operator, registrar or another service provider;
- whether an opaque identifier or wallet address is sufficient;
- what information, if any, must be published through RDAP;
- whether existing disclosure mechanisms apply; and
- how privacy and data-minimization requirements will be addressed.

If ICANN determines that new registration-data obligations are appropriate, those obligations should be developed through the applicable policy and contractual processes.

¹ The report does not expressly require use of RDRS for alternative-only names. It does, however, require RDAP extensions under the SRS model and states that existing ICANN policies would apply even to integrated alternative names that are not activated in the DNS.