

RrSG Public Comment: [Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems](#)

18 September 2026

The Registrar Stakeholder Group ("RrSG") appreciates the opportunity to provide a comment on the [Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems](#) ("Report") and the work of the Technical Study Group ("TSG") on drafting this Initial Report. The ongoing safety and security of the Domain Name System is a matter of significant importance to the ICANN Community, and the RrSG appreciates the dedication of the team in considering this matter.

The Registrar Stakeholder Group is the representative body of ICANN-accredited domain name registrars. Operating with numerous subgroups focused on specific topics of interest, the RrSG contributes to policy development, issue advocacy, and negotiations with ICANN. We work to advance the interests of registrars and our customers by promoting data-driven policy outcomes. Learn more about the RrSG on our website rrsg.org.

RrSG input on process

Purpose and impact of Report

The Report is "written primarily to provide advice to ICANN org in evaluating a proposed registry service" (pg 5), however the RrSG notes that **the Report's drafting and anticipated use are difficult to reconcile with its stated purpose as an advisory document**. As examples:

- The Report adopts the RFC 2119 / RFC 8174 key words (§3) and uses MUST, MUST NOT, etc throughout; this is the language of a conformance specification rather than of advice.
- §7 states that the technical requirements cannot be reduced below those set out in the Report, and that proposals weakening them "must be rejected;" an advisory document does not ordinarily establish a floor binding on the evaluator.
- §8.3 acknowledges that its requirements carry "policy implications needing to be discussed with the community," without identifying where that discussion is to occur.

Taken together, this suggests the Report may operate as a *de facto* requirements baseline for Contracted Parties developed outside the standard policy development process. The RrSG asks ICANN to:

- State whether conformance with the Report will be treated as necessary, sufficient, or merely indicative in an RSEP evaluation;

- Clarify by what process the Report's normative requirements would become contractual obligations on registry operators or registrars and how affected contracted parties will be consulted; and
- Confirm whether any pending gTLD application or RSEP request depends on completion of this work.

Does this remain within the Picket Fence?

The RrSG notes that **ICANN's remit is limited to governance of the Domain Name System**. The Report's §1 and accompanying footnote set out a considered position on remit: that ICANN's role is limited by the "reasonably necessary" criterion of Bylaws §1.1(a)(i), that coordination of the integration itself meets that criterion, and that ICANN's remit "need not expand beyond" it to alternative naming systems generally. The RrSG does not dispute that framing; **this Report and all ICANN output must remain within the boundaries of the Picket Fence**.

As such we note three concerns with the remit of this Report:

- **Several proposed requirements reach past the boundary the Report itself draws.** §4.6 requires demonstration of control over the alternative naming system's own change interfaces and access controls; §8.5 and §8.6 specify deactivation and suspension behaviour within that alternative naming system; and §8.4 makes the availability of a DNS name contingent on the alternative system's expiry policy. **These regulate the operation of the alternative naming system, not the point of integration.**
- The "reasonably necessary" test is applied in §1 to whether ICANN coordinates the integration at all. It is not then applied to the individual requirements the Report proposes. **Requirements that are not necessary to the openness, interoperability, resilience, security or stability of the DNS have not been shown to meet the Bylaws standard, and the Report offers no analysis distinguishing those that do from those that do not.**
- **The Report's remit analysis considers ICANN's authority in relation to alternative naming systems, but not the position of registrars.** Several requirements would direct registrar conduct in respect of a namespace with which the registrar has no contractual relationship—§8.5's guidance "If a registrar is adding a clientHold to undertake disabling a name, it SHOULD place the clientHold for the same name in every naming system" is a clear example of this.

The RrSG also notes footnote 2's conclusion that integration is "too close to the core of name resolution" to be handled through Registry Voluntary Commitments. **We would ask the TSG to explain why the same reasoning does not also weigh against establishing these requirements through RSEP evaluation alone, rather than through a policy development process.**

The RrSG asks that the Final Report **identify for each proposed requirement the basis on which it is considered reasonably necessary** within the meaning of Bylaws §1.1(a)(i), and **distinguish requirements directed at the integration from those directed at the operation** of an alternative naming system. Finally, **the Report should be adjusted to remain within the boundaries of ICANN's remit.**

TSG composition and context

The Technical Study Group included a registrar representative whose background is policy-focused rather than technical. While the registrar representative was certainly well able to provide valuable input and bring the benefit of years of experience and ICANN participation to the table, the RrSG recommends that **future study groups on this topic should ensure a technically-focused registrar representative is included**, alongside the existing IETF representation and others noted in the group.

Further SSAC's RIDE group is understood to be covering similar—but not identical—ground on alternative naming spaces. **The relationship between the TSG's work and RIDE's should be clarified to avoid duplicative or conflicting work or guidance.**

Many of the synchronization challenges identified in the Report (e.g., linking two namespaces, same-entity principles, EPP changes) closely parallel work already done by the IDN EPDP on synchronizing IDN and ASCII domains. **There are reusable lessons and frameworks from that effort worth referencing**; we do not need to reinvent the wheel.

RrSG input on substance

Implementation responsibilities

The Report proposes obligations that land on registrars to fulfill, including technical updates to parse new EPP and RDAP extensions, modifications to deactivation and suspension processes, and possible effects on registration validation and modification requirements.

The Final Report should include an implementation analysis documenting, for each proposed requirement: which party implements it, who benefits from it, and whether the requirement is necessary to the security, stability, and resilience of the DNS.

The Report is unclear as to whether renewal should, could, or would be handled out-of-band, reducing the registrar's role to an administrative service, and did not offer a holistic view of the payment flow implications. As a standard, gTLD domain renewals must be processed through the sponsoring registrar, while alternative name system string renewals should be handled by the alternative name system and are not in scope for any ICANN process.

The Report addresses expiry in §8.4, but the string's release path requires a decision that the alt-name is no longer to be maintained. Where the alternative naming system has no expiry cycle, no such decision point arises and the DNS name remains withheld indefinitely—with no controller, no renewal relationship, and no route back to an allocatable

state. **The RrSG asks that the Final Report require any integrated alternative naming system to provide a defined mechanism by which a coupled name is returned to availability.**

Further, we note that reserving or blocking a domain in the DNS against registration typically still costs the registrar the standard annual rate, with occasional exceptions in cases where a registry reserves a specific string. Integrating alternative name systems, with possibly different pricing across different systems, brings significant complexity. Availability under §8.1 and §4.3 is an intersection across all integrated systems: a name allocated in any one is withheld in all others. Where those systems are priced differently, the lowest-priced namespace sets the cost of removing a name from the highest-priced one and the party doing so need never acquire the DNS name at all. **In the global DNS the cost of denying a name equals the cost of holding it, renewed annually.** Under integration these diverge, and where the alternative system sells perpetual registrations—a case §8.4 contemplates—the denial is both permanent and unrenewed.

The consequence for registrars is twofold. A portion of a TLD's namespace can be rendered unsellable through the accredited channel by transactions that never traverse that channel, so the effect is not a cost that lands but a transaction that never occurs. And, to the extent registrars are billed for withheld names—the position ICANN corrected for IDN variants and which the Report does not displace—that billing would arise from allocations the registrar neither made nor could have prevented.

The Report offers no means to detect or reverse such an accumulation: §4.3's integration-prohibited option and §10.1's guidance to public suffixes are zone-level switches, not controls within an integrated zone. **The RrSG asks that the Final Report address the pricing relationship between integrated naming systems, and confirm that registrars will not be billed in respect of names withheld as a result of allocations made outside the registrar channel.**

Technical and operational integration gaps

There are operational gaps or mismatches between the DNS and alternative naming systems; these should be clearly addressed in the Report:

- **Registrant contact and compliance:** Alternative naming systems (e.g., wallet-based systems) may be anonymized with no associated contact information. How would a registrar meet existing compliance obligations (e.g., providing notice to a registrant) without that data?
- **Registration data verification:** There are open questions regarding registration verification where the only available identifier is a wallet address. How would the registration data, including email address and phone number, be verified? Will the alternative namespace relay contact information between the namespaces?

- **Registration lifecycle:** Some alternative name systems use perpetual registrations rather than the standard 10-year maximum lifecycle. How should this be reconciled with existing registry agreement terms?
- **Registrar awareness of integrations:** Registrars cannot be expected to discover, verify, monitor, or synchronize registrations across third-party alternative name systems. Any integration requirements must be handled by the registry and passed on to registrars.
- **Suspension handling:** If a name is suspended in the alternative naming system, what should happen to its DNS delegation? How would a registrar be notified that a suspension occurred?
- **EPP protocol impact:** Would this require IETF-level changes to EPP, or can it be accommodated within existing EPP extensions? At minimum, Contracted Parties should be made aware of restrictions being applied in the alternative naming system.
- **Notification/polling:** From a registrar perspective, timely notification of changes is critical. It's expected that EPP poll messages could still function even if the alternative naming system acts as the parent controller, assuming information is properly propagated through EPP—though new APIs may also need to be developed.
- **Registry connectivity:** Registries would need to operate a system connecting to the alternative naming system to receive authoritative status messages and relay them to registrars when issues arise. ICANN should require RSEP applicants to clearly document lifecycle control and points of authority so that registrars understand what to expect operationally.
- **Gap identification responsibility:** The responsibility for identifying integration gaps should sit with the RSEP/RSTEP applicant, so that any review panel has a clear and consistent basis for evaluation.

Public readability

As indicated in the Report, queries are responded to by the same party whose behavior is being verified. For example, a registrar submitting an EPP check and a dispute resolution provider issuing an RDAP query both receive responses from the Registry which controls the string in the DNS as well as the alternative naming system.

The Report requires that new RDAP extensions be created, but not that the alternative naming system be responsive to RDAP queries. **Either this RDAP responsiveness should be required or the Report should acknowledge that the integrated state is attested by the registry and not verified independently.**

Further, it is unclear as to whether these alternative naming systems need to use RDAP or be listed in the RDAP response for DNS names; this should be clarified. **Registrars must not be required to return links to alternative naming systems in RDAP responses for gTLD domains.**

Scope of applicability

The RrSG notes that §3 permits integration with any number of alternative naming systems, while the Report's analysis throughout is limited to the two-system case. §6.1 acknowledges that risk rises with the number of systems but proposes no limit, threshold, or additional evaluation.

The Report does not address adding a further naming system to an already-integrated TLD. §8.3's corollary requires pre-existing names in a newly integrated system to be enrolled and at least withheld from the global DNS, which cannot be reconciled with those names already being allocated and active in the DNS to a different controller.

The RrSG asks whether each additional naming system requires its own RSEP evaluation, and how registrars are to be notified when one is added to a TLD in which they hold registrations.

Registration vs. resolution

The Report should clearly distinguish between **registration** considerations and **resolution** considerations, including how wallet addresses are represented across different underlying technologies as well as how reverse mapping (to and from) should work in each context.

Rights protection and DNS Abuse

Requirements relating to DNS Abuse mitigation and rights protection mechanisms are unclear. Specifically, would existing Abuse-response obligations apply only to DNS Abuse or would they extend to abuse occurring in the alternative naming space itself? If a DNS domain name is taken down due to DNS Abuse, what happens to the alternative system name? Would the URS and UDRP be extended to alternative name spaces and, if not, what happens when an integrated domain is subject to this type of action? These should be clarified in the Final Report.

Thank you,

Owen Smigelski

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