

Tucows public comment: Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems

18 September 2026

Tucows welcomes the opportunity to comment on the [Initial Report of the TSG on gTLD Integrations with Alternative Naming Systems](#) (“Report”) and appreciates the Technical Study Group (TSG)’s work through the drafting process. The Report provides a useful starting point for the consideration of this topic but strays too far into policy-making and does not remain solidly within the boundaries of the Picket Fence.

Tucows Domains offers registry services platforms built for resilience, scalability, and global distribution, including the service platform for the operator of the .Locker top-level domain. Tucows Domains is also the largest wholesale domain registration services provider in the world; the Tucows Family of Registrars includes Enom, LLC (IANA 48), Tucows Domains, Inc. (IANA 69), EPAG Domainservices GmbH (IANA 85), and Ascio Technologies, Inc. (IANA 106). Based in Canada and with offices globally, Tucows is a staunch supporter of the free and open Internet. We participate in policy development at ICANN and in other venues, advocating for a data protection by design and by default approach to Internet policy and working to ensure that our customers’ and Internet users’ concerns are considered.

Scope and purpose of the Report

It is crucial that ICANN’s work, including that of the TSG and their Report, remain within the scope of ICANN’s remit. Specifically, while the Report can provide a potential implementation on the DNS side, it should not stray into guiding the alternative naming system implementation of any integration between the two.

Tucows supports the Registrar Stakeholder Group (“RrSG”)’s [input on this topic](#), including their requests for clarification on the Report’s status as an advisory document and whether the requirements laid out within are expected to become binding on Contracted Parties.

Obligations for ICANN Contracted Parties

The Report proposes obligations which could have follow-on effects for ICANN-accredited registrars and registries (together, Contracted Parties): technical updates for new

functionality, modifications to existing domain lifecycle processes, and impacts on validation and data update obligations. Any changes of this nature must go through the standard ICANN policy development or contractual negotiation process before they are implemented.

Tucows supports the RrSG's comments including that the Final Report should include an implementation analysis documenting the expected responsibilities for all involved parties, and adjustments to the expected renewal and release process for integrated alternative naming system strings.

Tucows also notes that the RrSG comment offers a list of integration gaps which should be addressed within the Final Report.

Conclusion

While it is useful to consider how the DNS can be integrated with an alternative naming system, and to provide advice for how a Registry Services Evaluation Policy process could be undertaken to approve the integration of a specific Registry with an alternative naming system, this work must be conducted within the boundaries of ICANN's scope.

Tucows again thanks the Technical Study Group for their work on this Report and looks forward to the revised Final Report.

Thank you,

Sarah Wyld

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