

1. Support for the TSG's Work

I support the TSG's effort to define technical requirements for integrating global DNS gTLDs with alternative naming systems. The report usefully focuses on string+controller integration and, in particular, on the principle that the same name should be controlled by the same party across the global DNS and any integrated alternative naming system.

My principal suggestion is that the report should explicitly address how that principle applies where the alternative naming system is already substantially populated before the corresponding gTLD is delegated in the global DNS.

2. Need to Address Pre-Existing Alternative Naming System Populations

Some alternative naming systems are not empty namespaces. They may already contain substantial numbers of allocated alt-names, active users, accounts, services, applications, and communities. In some cases, these systems may have hundreds of thousands or millions of users.

This is materially different from the historical launch of a new gTLD, where the namespace generally begins without existing DNS registrants at the second level.

Even where some aspects of this transition are ultimately matters of policy rather than technical implementation, the technical integration framework should expressly identify pre-existing alt-name allocations as a deployment condition that must be addressed before integration occurs.

3. Explicit Request to the TSG

I request that the TSG add a requirement, or at least a recommended evaluation criterion, that any registry operator or applicant proposing to integrate a populated alternative naming system must provide a pre-launch transition plan.

That transition plan should explain how existing alt-name holders will be identified, how controller equivalence will be verified, how matching DNS-names will be withheld or protected from conflicting allocation, and how existing alt-name holders will be given a clear process to connect or activate the corresponding DNS-name where permitted.

4. Why a Transition Plan Is Necessary

Without such a process, the registry may face a significant launch problem. If many alt-names already exist in the alternative naming system, the corresponding DNS-names may need to be withheld from general availability to prevent conflicting allocations.

If there is no clear path for the existing alt-name holder to transition into the global DNS, large numbers of valuable DNS-names may remain withheld, unavailable, or operationally uncertain. That would be a poor outcome for users, for the registry, and for the success of the new gTLD.

A transition plan would reduce that risk by making the relationship between existing alt-names and corresponding DNS-names explicit before launch.

5. Existing Communities as Evidence of Demand and Utility

A pre-populated alternative naming system should not be viewed only as a source of transition complexity. It can also provide strong evidence that the proposed integration has a real and demonstrated use case.

Where an alternative naming system already has active users, allocated alt-names, applications, accounts, services, and community participation, that existing activity provides evidence that the naming model is not merely speculative. It can demonstrate existing use of and demand for the namespace, including use for identity, navigation, application-layer services, wallets, or other practical purposes.

This is directly relevant to ICANN's evaluation of integration. The presence of an existing namespace community can show that integration with the global DNS would serve existing demand rather than attempting to create demand only after delegation.

6. Integration as a Path Toward Interoperability

For a new gTLD, one of the hardest problems is building meaningful adoption. A corresponding alternative naming system with an existing community changes that starting point. The registry is not launching into an empty namespace. It is potentially extending an already active naming community into the globally coordinated DNS.

If managed correctly, this can produce a healthier and more successful gTLD launch. Existing alt-name holders may become early DNS registrants. Existing applications and services may gain DNS compatibility. Users may be able to connect established alternative naming identities with DNS-based services such as websites, email, authentication, and other Internet infrastructure.

This can create a meaningful public-interest benefit: integration can help bring existing alternative naming activity into a more interoperable, stable, and globally coordinated environment.

7. Suggested Addition to the Report

I suggest that the report add a section addressing "pre-existing alternative naming system populations." That section should require a registry operator or applicant proposing integration to document:

1. **How many existing alt-names there are, and how they are being used.**
ICANN should understand whether the alternative naming system has a small number of inactive names or a large active community using names for identity, websites, applications, wallets, or other services.
2. **What contractual entitlements and expectations existing alt-name holders have.**
The applicant should explain the applicable terms, representations, limitations, and user expectations associated with those alt-names, including whether users were told that control was permanent, renewable, transferable, or subject to other conditions.
3. **How the same controller will be verified.**
The applicant should explain how it will prove that the person or entity controlling an alt-name is also the correct party to control the matching DNS-name.
4. **How matching DNS-names will be protected during launch.**
The applicant should explain whether corresponding DNS-names will be withheld, reserved, blocked, or otherwise protected from allocation to another party while existing alt-name holders are given an opportunity to establish control and connect them, including the duration of that protection and any associated fees or conditions.

5. **How existing alt-name holders can connect their names to DNS.**

The applicant should provide a clear process for an existing alt-name holder to claim, enroll, activate, or otherwise connect the matching DNS-name.

6. **How conflicts with ICANN rules will be handled.**

The applicant should explain what happens if an existing alt-name conflicts with reserved names, trademark protections, rights protection mechanisms, blocked names, or other ICANN consensus policies.

7. **What happens to names that are not claimed or cannot be verified.**

The applicant should explain whether those DNS-names remain withheld, become available after a defined period, are allocated through another process, or remain permanently unavailable.

8. Benefits of Recognizing Pre-Existing Communities

Recognizing pre-existing alternative naming communities would strengthen the report by allowing ICANN to distinguish between speculative integration proposals and proposals involving demonstrated existing use.

It would also encourage applicants to plan transitions before delegation, reduce the risk of conflicting allocations, and potentially provide a base of early adopters for the corresponding DNS gTLD.

9. Important Limitation

An existing alternative naming community should not automatically create a right to DNS delegation or DNS-name allocation. ICANN must still evaluate the proposed gTLD and any integration service under the applicable rules, including security, stability, rights protection, reserved names, and consensus policy requirements.

However, the existence of an active alternative naming community should be recognized as important evidence that integration may serve a real user community, improve interoperability, and support a successful gTLD launch if handled under clear ICANN-supervised rules.

10. Conclusion

The additions above would recognize the distinct situation that arises when a proposed gTLD corresponds to an already substantially populated alternative naming system. Where a gTLD is not launching into an empty namespace, ICANN's evaluation and integration framework should reflect that operational reality.

Applicants proposing such integration should be required to explain, before launch, how pre-existing alt-name holders will be identified and treated, how matching DNS-names will be protected against conflicting allocation, how controller equivalence will be verified, and how unresolved names or conflicts with ICANN requirements will be handled.

At the same time, the existence of an active alternative naming community can provide meaningful evidence of existing use, demand, and potential utility. It should not create an automatic entitlement to DNS delegation or registration, but it should be recognized as relevant evidence when assessing whether responsible integration could improve interoperability, support adoption, and serve an existing user community.