Additional Comment the IDN EPDP Phase 1 Initial Report

As part of the release of the IDN EPDP Phase 1 Initial Report, PointQuébec submitted a public comment on May 16 2023 proposing a process specific to the delegation of IDN geoTLDs for both the 2012 Round GeoTLD applicants and the new geoTLDs intending to apply in the next round.

Today, we are submitting an additional comment, in relation with an ICANN Board resolution specific to the issues raised by PointQuébec.

In addition, we also provide an example of an evaluation framework proposed for IDN ccTLDs to mitigate and remediate security and stability risks. This suggestion of a framework revised and extended to IDN geoTLDs makes it possible to envisage consistency of approaches between the GNSO and the ccNSO during stability and security assessments and the implementation of measures in order to maximize a stable and secure environment during the deployment of a geoTLD IDN such as . QUÉBEC.

1. ICANN Board Resolution 09 of March 13, 2019 requests the GNSO and ccNSO to propose consistent solutions between the policies and procedures surrounding the deployment of IDN ccTLD variants and gTLD variants.

*Resolved (2019.03.14.09), the Board requests that the ccNSO and GNSO keep each other informed of the progress in developing the relevant details of their policies and procedures to ensure a consistent solution, based on the Variant TLD Recommendations, is developed for IDN variant ccTLDs and IDN variant gTLDs.*

The ICANN Board Resolution paves the way for the IDN EPDP WG and possibly the Implementation Review Team (IRT) to include in the policies and procedures framework, the relevant elements of the ccNSO PDP4 with a view to harmonize policies and procedures.

1. An evaluation of DNS stability of an IDN geoTLD implementation such as .QUÉBEC must take into account the previously delegated ASCII geoTLD (2012). A technical procedure is in place since 2009 validating those requirements, thus paving the way for a successful evaluation.

*If, at the time of the request or within two months after receiving the notification
of the findings of the DNS Stability Panel, the requester, and, if considered
necessary by ICANN, the relevant public authority, provide(s) a clarification that
documents and demonstrates to ICANN that:*

 *1. The intended manager for the requested IDN ccTLD and the manager for the
existing two-letter ASCII ccTLD are one and the same entity; and
2. The intended manager shall request the delegation for the IDN ccTLD string if
validated;and
3. The IDN ccTLD and ccTLD shall remain to be managed by one and the same
entity,and
4. The intended manager shall agree to specific and pre-arranged conditions
with the goal to mitigate the risk of user confusion as of the moment the IDN
ccTLD becomes operational,*

 *then the requested string is deemed to have passed the DNS Stability Panel
evaluation.*

*(Final Implementation Plan for IDN ccTLD Fast Track Process Marc h28 2019, p.28)*