PointQUEBEC would like to express the following comments on the Phase 1 IDN EPDP report.

Several issues were not raised in this Phase I initial report.

1. Some issues are related to GeoTLDS which were part of the 2012 round.
2. Other topics are related to new GeoTLDs applicants in the next round.

The GeoTLD Group is a sub-group part of the GNSO. It refers to:

* Territories, states, provinces or geographic entities described in the ISO 3166-2
* Country capitals and cities listed in the ISO 3166-2
* Entities part of the UNESCO geographical regions and indexes

Local languages and GeoTLDs

Like ccTLDs, most of the geoTLDs have a legal obligation to provide services to their population in the official local language(s) and/or the local recognized language (including native languages, first nations languages, and indigenous languages).

The meaningful name representation(s) of most of the geoTLDs, like ccTLDs, is governed by laws, is confirmed by toponymic regulation and official writing (script), is entrenched in historical national decrees, codification and local bylaws.

Over the years, ccTLDs have expressed an urgent need to display their legitimate country name inside their own ccTLD spectrum in their own specific local linguistic(s) reality(ies).

The fast-track path for ccTLDs is an interim solution and a fair representation of the challenges facing the linguistic diversity in the whole world.

The program offers to ccTLDs the possibility to apply for one IDN per script or per official language (any time i.e. an ongoing open-round) as long as the requested IDN is the name of the country or the short form of the ccTLDs.

But languages based on the latin script were not eligible for the IDN ccTLD fast-track program. We believe it’s not a matter of technology.

India has 15 ccTLDs ASCII and IDNs representing 15 different languages and/or scripts of the country known in English as INDIA.

The price tag for each applied for IDN ccTLD is 26,000 $ US. The time frame between an application and a delegation can be ad minima 1 year.

GeoTLDS are facing linguistic and legal obligations like ccTLDs. The challenges of geoTLDs are similar or identical regarding the nature and the formal relationship with a local person.

In the 2012 round, most of the geoTLDs applied for an ASCII geoTLD. The price tag was 185,000 US$.

Some geoTLDs did express in their 2012 application their intention to apply for an IDN. Unfortunately several tools, policies, UA effectiveness, technological readiness, foreseen and predictable financial figures were not in place to accommodate such a delegation.

The only realistic perspective for all intended geoTLDs applicant wishing an IDN was to wait for the next round.

In the years following the 2012 round, geoTLDs waiting for a meaningful local linguistic representation of their ASCII geoTLDs were invited to follow, participate or observe the work of their respective language, among which there is the LGR.

In 2012 there was no definition of what a variant meant. Some geoTLDS considered that the applied-for or delegated ASCII geoTLD was in fact a self-declared variant of their own local language or geographical denomination.

At the end of 2021, for the Latin Script Generation Panel, some geoTLDs realized that their local definition of a variant was quite different from what the panel ¨experts¨ defined as a recognized variant. Public comments were submitted regarding this issue and still as of today, geoTLDs are still waiting for an answer and a solution from ICANN.

At the end of 2022, the ODA SUBPRO Report was silent on the overall situation of actual and future geoTLDs and their intrinsic challenge to decline their TLD in a local language.

In the same 2022 ODA SUB-PRO Report the situation regarding the 2012 round regarding their IDN geoTLDs for which they were unable to apply, is omitted.

The IDN EPDP should incorporate in their report specific recommandations regarding 2012 ASCII geoTLDS looking for an IDN and specifically those who expressed their intention to apply and were unable to do so.

Those recommendations should address the prioritization of the 2012 GeoTLDs who could not have their name delegated in their local script, ahead of all other applications for those 2012 ASCII geoTLDs in the same way that priorization was formulated for IDN gTLDs who were unable to apply for variants back in 2012.

The IDN EPDP should recommend a specific fee for the 2012 round ASCII geoTLDs applicants to obtain an IDN geoTLDs in the next round. The fee should be equivalent to the same fees charged to ccTLDs applying for the fast track IDN ccTLDs (26,000 US$).

Among the major challenges for national, geographical entities, there is “Universal Acceptance” communication with local residents. It means providing to a local individual a name in his local language with the local script in use. In some national or geographical regions, this conversation will take place in several official languages or scripts. Since COVID-19, the online communication has taken a dominant role in a vast proportion of the world. The Internationalization of e-mail functions and addressing is still ad minima if not non-operational.

So even if UA is a strategic objective in the Internet sphere, the actual situation still needs to be significantly improved to achieve UA .

Nations, and geographical entities even if they have their IDN TLDs, even if IDN second-level IDN names are available, even if the content is displayed in the local languages, the challenge regarding the addressing or the EAI needs a back-up solution.

One solution is to be able as a ccTLD or geoTLD to offer, in the meantime the e-mail address in ASCII at no additional cost for the end-user.

The ASCII for a specific geoTLD, as his IDN geoTLDs in one or several languages and script of this same geoTLDs should have annual ICANN fees calculated in the same way as the fees for a gTLDs and his variants. It should be an annual fee for all the variants linked to a specific geoTLD. The registry-level transaction fee should be based on cumulative domain name registrations.

Finally, we want to mention that a GeoTLD is likely to apply for more than one IDN like India did, like China did or Singapur. We suggest that the rules or policies take into consideration that reality.

The first round for new geoTLDs took place in 2012. The next round of delegation is not expected before 2025 at the earliest.

There is no third round time prediction at this stage. The time lapse between rounds is uncertain. There is no plan at this moment to have in the future an ongoing open round for geoTLDs.

The actual IDN EPDP framework envisions a single IDN applied for per geoTLD.

In a large number of geoTLDs, there is several official languages or scripts. There is also recognized languages from local communities and most of the time they are part of geographical minorities.

The next round should offer the possibility for geoTLDs to apply for one IDN per official or recognized language and script as long as the requested IDN is the meaningful name of the geoTLDs. A proportionate and cost recovery fee should apply.

Brussels and Geneva are a good examples of this situation. As capital cities, Brussels and Geneva have several official languages and each of those capital cities could be entitled to more than one IDN geoTLD since Brussels, Brüssels and Bruxelles are a meaningful representation in an official script and language (Dutch – German – French) and Genève – Geneva – Genoa – Gend (French – Romanche – Italian – German) represents the same geoTLD location.

As previously described, a similar provision exists for IDN ccTLDs i.e. ccTLDs are entitled to as many IDN TLDs per language or script as long as the applied for IDN TLDs is a meaningful representation of the ccTLDs in a particular language and script .

We submit to ICANN and IDN EPDP that if only one IDN per geoTLD is allowed in the next round, it would close the door not officially, but practically, to geoTLDs denomination for the language of minorities, indigenous, native and first nations.

**Recommendations to the Phase 1 Initial Report on the Internationalized Domain Names Expedited Policy Development Process**

1. As a onetime exception for the immediate next application round, all applications for an IDN geoTLD of an existing geoTLD from the 2012 round must receive priority in processing order ahead of all new gTLD or new geoTLD applications.
2. For this onetime exception for the immediate next application round, the application fee for an IDN geoTLD of an existing geoTLD from the 2012, should be based on a cost recovery principle. (as a bench mark, the application IDN ccTLD fee for an existing ccTLD based on a cost recovery principle is 26,000 US$)
3. The one registry fixed fee must cover the delegated geoTLD (ASCII), and the IDN geoTLD(s) label(s) and their variant label(s) set(s).
4. The calculation of the registry-level transaction fee must be based on cumulative domain name registrations of the combine geoTLD (ASCII) label, and IDN geoTLD(s) label(s) (including respective variant label(s) set(s)).
5. We suggest that geoTLDs should be authorized to apply for an IDN per script or per official or recognized language as long as the requested IDN is the meaningful name of the geoTLD.
6. A proportionate and cost recovery fee should be charged, accordingly.
7. GeoTLD first nations, or indigenous groups native language and / or script IDN geoTLD applicants should be provided the opportunity to apply for such a string but the onus is on the applicant who may have to wait for an indeterminate amount of time until the script of the applied for strings is integrated into the RZ LGR