

The ICANN GNSO "Business Constituency"



ICANN Business Constituency (BC) Comment

on

[Phase 1 Final Report of the EPDP on Internationalized Domain Names \(IDNs\)](#)

12-Mar-2024

The BC appreciates the opportunity to provide comment to the ICANN Board about the [Final Report of the EPDP on IDNs](#). The BC notes that some of our [previous comments](#) on this subject were incorporated in the Final Report, and we would encourage the Board to review it again as part of our input in this comment period.

At the high-level, BC would support the ICANN Board to encourage the continuous and healthy development of IDN in both gTLDs and ccTLDs. BC acknowledges the current use of IDN TLDs may be still limited, and the user experiences vary from TLD to TLD. On the issue of variant at the top-level, some IDN ccTLD allows variant / synchronized TLD, and some chose not to request a variant string. For IDN gTLD applicants in the 2012 round, some submitted corresponding variant strings to ICANN and some were not. BC believes that a future IDN TLD applicant should continue to have such a choice of not applying variant TLD.

BC would also suggest the Board to review its [2010 decision on variant management](#) which confirmed and helped create different user experiences in IDN ccTLD and gTLD. The Board now has the responsibility to timely address how these changes (i.e. allowing IDN variant gTLD) are going to impact future IDN applicants and the users in general in its new gTLD awareness campaign.

BC continues to have strong concerns about the implementation of the "Conservatism" principle, and believes that the ePDP team made the recommendations contrary to such principle. Specifically, as we outlined in our previous comment, the "Same entity" rule should apply to not only at the top-level, but also across all levels (IDN.IDN). Without such policy and implementation in places, domain names used as a business (and visited by the customers) would likely to reduce or even lose its credibility and

confidence to the public. For example, 脸书.网站 (Simplified Chinese of facebook.website) and 臉書.網站 (Traditional Chinese of facebook.website) should be registered and allocated to the same registrant based on the “Same entity” policy, and they should have the identical Whois information. We strongly recommend to the Board that until such policy is agreed and implemented across all IDN gTLDs, no IDN.IDN variant should be allowed. Our recommendation follows SSAC60, Recommendation 4, point 3, that “ operators who intend to launch Internationalized Domain Name (IDN) 2LDs or IDN TLDs, with a focus on consistency of user experience.”. We urge the Board to make its decision strictly based on it.

The Final report continues to recommend (3.11) that up to 4 variant TLDs can be applied in the immediate subsequent round, whereas most of the 2012 round IDN applicants (with majority in Chinese / Han script) required only one variant string in its application document. It also recommends (3.14.1) a complete application fee waiver if the 2012 IDN applicant applied up to 4 variant TLDs in the immediate subsequent round. BC continues to object to these two recommendations and believes that the ePDP team made the recommendations contrary to the “Conservatism” principle. BC believes that the followings should be the reasonable path forward:

- Based on its 2012 submission, up to 1 variant per 2012 IDN gTLD should be allowed to have a one-time application fee waived. Additional variant TLD(s) should be allowed with additional base fee(s) per variant TLD charged by ICANN.
- No-ceiling rule applied to IDN variant gTLD in the subsequent round. Each variant TLD(s) added into the Applicant’s application document should be evaluated with additional base fee(s) per variant TLD charged by ICANN.

All IDN variant applications, including the 2012-round variant TLD requests, should be treated and grouped in the same priority batch. 2012-round IDN TLD does not receive any prior rights in the application queue. BC believes that the 2012 application materials could be outdated to these IDN gTLDs (i.e. change of ownership, change of back-end services, etc.), and they can be processed along with other IDN applicants in the subsequent round.

On the issue of single character Han (Chinese Japanese Korean) script in the subsequent round, BC holds its neutral position but strongly urges the Board to call for a cross-community consultation on this issue prior to making any decision. Proper policy consultation with the ccNSO and the GAC is essential as hundreds of single-character Han scripts are used as abbreviations of country, territory, and geographic

names in daily life. For example, “米” is a Han-script for “Rice” in Chinese and Japanese, or an abbreviation of “America” in Japanese. At this point, BC believes that an immediate examination of the Draft language of Geographic Names in the new AGB should take place. The cross-community consultation should help evaluate whether the current objection process is sufficiently enough, or if a prohibitive list of single character Han script, as indicated in the Final report, is a workable approach.

BC would like to respectfully remind the Board that voting on the above issues require strict COI declaration. Board members, who have ownership and stakes in any IDN gTLD related businesses, should be requested not to participate in the voting processes.

This comment was drafted by Ching Chiao and approved in accord with our charter.