![SSAC ICANN Security and Stability Advisory Committee]

28 February 2023

Subject: SSAC2023-02: SSAC Public Comment on Proposed Procedure for Selecting a Top-Level Domain String for Private Use

To: Andrew McConachie, ICANN Policy Support Staff; Kim Davies, Vice President IANA Services & PTI President

On 13 January 2023, the Internet Corporation for Assigned Names and Numbers (ICANN) opened a public comment forum to obtain input on the Proposed Procedure for Selecting a Top-Level Domain String for Private Use.[1,2] The SSAC thanks ICANN org for its work producing the proposed procedure and welcomes the opportunity to provide comment.

The proposed procedure states that, after it is finalized following this Public Comment, the next Public Comment will be after the string election has occurred and will only seek comments on the implementation of the process and not the output of the process (i.e., not on the selected string itself.) Section 4 of the document states:

> "ICANN org will hold a Public Comment proceeding on the draft selection document. The proceeding will ask the community to verify that IANA followed the process given in the final version of this document in making its choice. Commentary on the string itself will be out of scope for the Public Comment proceeding."

The SSAC considers that this proposed procedure needs to have more detail in it, especially about how it will assess Criteria 3 and 4, if there is to be no further opportunity to comment on the process. This document already states that both these criteria are subjective, but makes no proposal about how judgements will be made. Section 2 simply states:

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[1] See Public Comment for Proposed Procedure for Selecting a Top-Level Domain String for Private Use, https://www.icann.org/en/public-comment/proceeding/proposed-procedure-for-selecting-a-top-level-domain-string-for-private-use-13-01-2023

[2] See Procedure for Selecting a Top-Level Domain String for Private Use, https://itp.cdn.icann.org/en/files/root-system/procedure-selecting-top-level-string-private-use-draft-11-01-2023-en.pdf

"...a preferred candidate will be identified through deliberation within an internal evaluation team."

In particular, the proposed procedure should explain how candidate strings will be tested for confusing similarity, memorability, and meaningfulness, taking into account both native and non-native speakers of the language(s) in which the string is intended to be understood.

The SSAC suggests that, if the output of the proposed procedure is not able to be questioned, only whether the process has been followed, then the process described in the final version of this proposed procedure document needs to have more detail, and the community needs to have an opportunity to review it.

Rod Rasmussen
Chair, ICANN Security and Stability Advisory Committee