

## **ISPCP Constituency comments on Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems**

The Internet Services Provider and Connectivity Provider Constituency (ISPCP) is pleased to provide the following comments to the Universal Acceptance Roadmap for Domain Name Registry and Registrar Systems.

The ISPCP has filed numerous comments over the years on issues related to Universal Acceptance (UA). As representatives of organizations who run the “help desks” of much of the Internet, ensuring that the DNS evolves in ways that lessen negative impacts for users is one of our primary roles in participating in the ICANN policy-making process. We see the evolution of the DNS when it comes to string diversity, particularly in the area of IDNs, to be an extremely positive thing that aids all users who wish to use the Internet in their own languages. However, we are keenly aware of the challenges that exist when systems do not operate as intended and support efforts to address this serious concern proactively.

We value the role that ICANN org has taken in driving this effort forward within the ICANN ecosystem. The work they do will be invaluable in guiding the domain registry and registrar operators toward making wise decisions when it comes to UA. To that end, we are generally supportive of the efforts made within this study and, in particular:

1. Appendix A: Registry Testing
2. Appendix B: Registrar Testing

We believe that the effort undertaken in these reports is strong and good for both Registry & Registrar efforts around UA. Members of the ISPCP attended sessions at ICANN75 and left feeling confident in the technical rigor of these efforts.

As one point of guidance, we seek to discuss IDN variants. We understand that IDN variants are not considered in this study. This needs to be clear to those who are following this roadmap. We understand that IDN variants haven't been fully studied and discussed, so this could not be included sufficiently, but we also understand that strong concerns around issues arising from IDN variants remain. We are thankful that initial and minimal direction is provided within the reports. We believe that this subject is important enough to warrant being raised as an ongoing study needed in the opening of the report so that all who seek to follow the roadmap understand this potential deficiency.

Another point of guidance, we feel security as it relates to IDNs and UA would be a valuable topic of discussion. We note that the methodology used in this document is both robust and measurable, and security applications would add undesired complexity. However, DNS-based firewalls, URL filtering, and tools of this ilk rely, in part, on DNS for validation. We see opportunities for IDNs to be mishandled or ignored by security vendors that may choose to ignore UA as a priority. Operators, for example, could choose to ignore entire IDN-based TLDs.

We feel there are several directions that could be used to solve security concerns in this matter, but guidance included in this roadmap could provide a source for a singular direction.

Our final point is that while acknowledging this work is incredibly important, and the DNS is the building block for the rest of the Internet ecosystem, it is also likely the part of the ecosystem that has the most UA readiness to date. This work should be built upon further and roadmaps developed for other parts of the ecosystem, which need more readiness help. Specifically, we identify a need for help from the ISPs who represent the world's largest and most trafficked DNS resolvers. Please do not hesitate to reach out to ensure that the important work you are doing will lead to the most impactful results by eventually expanding beyond the root zone and guiding the less prepared players within our ecosystem in a similarly rigorous manner.