ICANN Org Input

The ccNSO Policy Development Process (PDP) 4 Working Group

Initial Report ccNSO PDP4 (de-)selection of IDNccTLDs

27 September 2023

Initial Remarks

ICANN org appreciates the opportunity to provide comments on the ccNSO Policy Development Process 4 Working Group's *Initial Report ccNSO PDP4 (de-)selection of Internationalized Domain Name Country Code Top Level Domains* covering four (4) stages:

1. The selection of the Internationalized Domain Name Country Code Top Level Domain (IDN ccTLD) string and related variants;
2. The validation of the selected IDN ccTLD string and its variants;
3. The delegation, transfer, and revocation of the IDN ccTLD string and its variants and, the retirement of the IDN ccTLD string and its variants;
4. The potential review of specific decisions pertaining to the delegation, transfer, revocation, and retirement of an IDN ccTLD string and its related variants.

In providing its input, ICANN org has reviewed the Initial Report, relevant ICANN Board resolutions (including Technical Utilization of the Root Zone Label Generation and Managing the IDN variant TLDs), as well as the anticipated implementation.

The ICANN Board requested 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. The ongoing work by the GNSO Internationalized Domain Names Expedited Policy Development Process (IDNs EPDP) Phase 1 Initial Report is also considered by ICANN org for this purpose.

This input is being provided to the ccNSO Policy Development Process 4 Working Group (ccNSO PDP4 WG) for its consideration.

ICANN org remains available to discuss any questions that the ccNSO PDP4 WG team may have with regard to this input. ICANN org remains committed to actively support the ccNSO PDP4 WG, community, and relevant stakeholders.

Input

Section 6.2.3 Limitation of Delegation of Variants

Input 1: Designated language requirement could limit the usability of variant TLDs for some script communities.

ICANN org recognizes that the following point was discussed earlier by the ccPDP4 team. However, we would like to raise it for the ccPDP4 team to reconsider.

Broader usability of an IDN ccTLD globally is a key motivation for enabling variant TLDs. Requiring the allocatable variant strings of the selected IDN ccTLD string to be meaningful representations of the name of the territory in **the designated language** can limit this usability of the variant TLDs.

For example, this prevents a country having the Arabic language as its designated language to apply for a variant IDN ccTLD in the Urdu language if the latter is not the designated language. But the Urdu variant of the IDNccTLD may be needed for usability of the IDN ccTLD string globally.

Thus, it would promote usability of variant IDN ccTLDs if the IDN ccPDP WG considers allowing them in languages other than the designated language (while other conditions would apply, such as the support from the relevant public authority and the community). It will still be up to the requestor to decide if they want to apply for such variant IDN ccTLDs.

The IDN ccPDP WG may consider making *Allocatable Variants of the selected IDN ccTLD string that are Meaningful Representations of the name of the Territory which are not in the designated language eligible for application in section* ***6.2.3 Limitation of delegation of variants.***

Section 7.2.3.A Delineating the Scope of Request Side

Input 2: The scope of the string similarity review on the Request Side may not fully address security issues and is not consistent with the GNSO IDN EPDP.

There are some differences between the scope of string similarity review for the proposed gTLD and ccTLD recommendations. Based on the GNSO Internationalized Domain Names Expedited Policy Development Process (IDNs EPDP) Phase 1 Initial Report and the ccNSO PDP4 Initial Report, the comparison of the scope of string similarity is shown in Table 1 below.

Table 1 lays out the scope of string similarity review between the requested string and the strings in the comparison side with the following notions:

- ‘cc-Yes’ Means that the ccNSO PDP4 Initial Report suggests the string similarity review comparison should include the category.
- ‘cc-Maybe’ Means that the ccNSO PDP4 Initial Report suggests the string similarity review comparison could be extended to include the category.
- ‘cc-No’ Means that the ccNSO PDP4 Initial Report does not suggest the string similarity review comparison for the category.
- ‘g-Yes’ Means that IDN EPDP Phase1 Initial Report suggests the string similarity review comparisons should include this category.
- ‘g-No’ Means that IDN EPDP Phase1 Initial Report does not suggest string similarity review comparison for the category.

The color codings are as follow:

- *Green: Same or no conflict.*
- *Yellow: Can be the same due to the expansion of scope by the panel as allowed by the policy.*
- *Red: Not the same as constricted by one of the policies.*

Table 1: Scope of String Similarity Review Comparisons Performed by the Panel

Categories for Comparison Side:		Request Side: Primary TLD string	Request Side: Requested delegatable variant string(s)	Request Side: All allocatable variant string(s)	Request Side: All blocked variant string(s)
● Existing gTLD ● Existing 2012 gTLD still in the process ● Existing ccTLD ● Requested IDN ccTLD ● Other Applied-for gTLD ● Reserved Name ● Any two-Character ASCII	String	cc-Yes g-Yes	cc-Yes g-Yes*	cc-No g-Yes	cc-No g-Yes
	Requested delegatable variant string(s)	cc-Yes g-Yes*	cc-Yes g-Yes*	cc-No g-Yes*	cc-No g-Yes*
	All allocatable variant string(s)	cc-Maybe g-Yes	cc-Maybe g-Yes*	cc-No g-Yes	cc-No g-Yes
	All blocked variant string(s)	cc-Maybe g-Yes	cc-Maybe g-Yes*	cc-No g-Yes	cc-No g-No

** IDN EPDP does not have the specific type “Requested delegatable variant string(s).” It is a subset of “All allocatable variant string(s)”.*

Allocatable variant labels and blocked variant labels are perceived as the "same" as the requested string by end users. Excluding the possibility to compare the allocatable variant labels and blocked variant labels may have a residual security risk due to user confusion.

If the IDN ccPDP4 WG allows the Similarity Evaluation Panel to extend the scope of string similarity review to other categories covered by the GNSO IDN EPDP WG, it would address the potential residual security risk and also maintain the consistency with the gTLD string similarity review.

The IDN ccPDP WG may consider adding the following paragraph in Section 7.2.3.A. (Please note that the text is aligned with the text already included in Section 7.2.3.B. for comparison side)

"It is proposed that the Similarity Evaluation Panel should determine which additional variants of the basic set of strings should be included in the ***Request Side,*** *factoring in:*

- *The likelihood of misconnection*
- *Scalability, and*
- *Unforeseen and/or unwanted side effects.*

In its report, the Panel must provide its reasoning for its determination, whether or not to include additional variants of the basic set of strings included in the request side."

Input 3: Request to provide guidance on sharing data of requested ccTLDs and applied-for gTLDs for the string similarity evaluation processes for IDN ccTLDs and gTLDs.

There is a possibility that an IDN ccTLD string is requested during a gTLD round. In this case, the requested IDN ccTLD string and the applied-for gTLD strings will need to be compared for string similarity by the String Similarity Review Panels as part of both the gTLD and the ccTLD application evaluation.

Given the confidentiality requirements in Section 15.1, ICANN org requests guidance from the IDN ccPDP4 WG on the process to share the requested IDN ccTLD strings under evaluation with the gTLD applicants and the gTLD String Similarity Review Panel.

Input 4: Policy or guidance on precedence consideration is required.

In the future, it is possible that an IDN ccTLD string is requested during a gTLD round, and the requested ccTLD string and the applied-for gTLD strings are found to be similar by the IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel.

A mutually consistent recommendation or guidance across both evaluation ccPDP4 and IDN EPDP processes on how to provide precedence to different applications is requested by ICANN for implementation.

The IDN ccPDP WG may consider details in the IDN ccTLD Fast Track Process, Section 5.5 String Confusion and Contention. A discussion with the GNSO IDN EPDP may also be helpful to develop a consistent approach between IDN ccTLD and gTLD applications for implementation.

Section 8.8 Risk Treatment Appraisal

Input 5: Risk Treatment Appraisal Procedure introduces strings that are confusable in the uppercase form into the root zone.

The IDN ccTLD Fast Track Process includes the Risk Mitigation Measure as part of the DNS Stability Evaluation. However, it is stated in Module 2: “The primary reasons for implementing limitations are that the process is experimental in nature and should not preempt the outcome of the ongoing IDN ccNSO Policy Development Process.”

The SSAC says in SAC089 that “Confusability cannot be considered in isolation from other issues related to security. Phishing and other social engineering attacks based on domain name confusion are a security problem for end users.”

Therefore, the IDN ccPDP4 WG may reconsider allowing such exceptions through the Risk Treatment Appraisal Procedure, as it introduces strings that are confusable in the uppercase form into the root zone.