

---

# Public Comment Summary Report

## Additional Reference Label Generation Rules and Related Updates

**Open for Submissions Date:**

Thursday, 12 September 2024

**Closed for Submissions Date:**

Thursday, 24 October 2024

**Summary Report Due Date:**

Friday, 15 November 2024 (Extended from Thursday, 07 November 2024)

**Category:** Technical

**Requester:** ICANN org

**ICANN org Contact(s):** [pitinan.koo@icann.org](mailto:pitinan.koo@icann.org)

**Open Proceeding Link:** <https://www.icann.org/en/public-comment/proceeding/additional-reference-label-generation-rules-and-related-updates-12-09-2024>

**Outcome:**

ICANN org appreciates the comments submitted by the community on the additional and updated reference Label Generation Rules (LGRs). ICANN org received 37 comments. Of these, 31 comments supported the Balinese script reference LGR, five comments supported the Inuktitut language reference LGR, and one comment supported the updated Myanmar script (Full Variant Set) reference LGR.

Based on the input received, reference LGRs will be finalized and published for the use of generic top-level domain (gTLD) registry operators as reference while they design their Internationalized Domain Name (IDN) tables. These LGRs will also be used in reviewing the IDN tables submitted by gTLD registries.

### Section 1: What We Received Input On

ICANN org reviewed input from the relevant communities on the already published [Second-Level Reference LGRs](#) for multiple scripts and languages for additional changes. Two updated Reference LGRs for Myanmar script (Full Variant Set) and Spanish language were released for Public Comment.

Additional Reference LGRs were developed based on the detailed analysis in consultation with the relevant language and script communities. Three new Second-Level Reference LGRs for Balinese script, Thaana script, and Inuktitut language.

ICANN org received feedback from the broader community on these updated and new Second-Level Reference LGRs.

## Section 2: Submissions

### Organizations and Groups:

Name	Submitted by	Initials
Point Québec	Claude Menard	PQ
Pengelola Nama Domain Internet Indonesia	Gheafany Widyatika Putri	PANDI
Janet McGrath	Tamalik & Associates	TA
The Canadian Internet Registration Authority	Georgia Evans	CIRA

### Individuals:

Name	Affiliation (if provided)	Initials
Dzaki Ramadhan		DR
Cokorda Pramatha	Udayana University	CP
I Komang Widia Pratama		IK
I Made Suma Gunawan		IM
Ngurah Kelvin		NK
Sigma Anasvara		SA
Ni Luh Eka Suryaningsih		NL
Arya Wira		AW
I Kadek Dwi Adnyana		IKD
I Wayan Kasu Wardana	Udayana University	IW
Ni Komang Purnami		NKP
I Gusti Putu Kresna Dana		IG
Surya Gemilang		SG
Bayu Yudistira Ramadhan		BY
Alexander Ibrahim		AI
Kadek Septhiana		KS
Royyan Fath		RF
Diva Damayanthi		DD
Jamrud Ivan		JI
Ditya Pradana		DP
Dodek Mardana		DM
Dominggo Pratama Sidauruk		DPS

Name	Affiliation (if provided)	Initials
Revaldy Hendrian		RH
Yudho Giri Sucahyo		YG
Marc-Antoine Mahieu	INALCO & LACITO (Centre National de la Recherche Scientifique)	MA
Muhammad Fauzi		MF
Mohamad Shidiq Purnama		MS
Ratih Ayu		RA
Muhammad Fauzan Paranditha	PANDI	MFP
Joni Iskan		JIS
Rizky Heryandi		RHE
Phyo Thiri Lwin	ALAC	PTL
Thomassie Mangiok		TM

## Section 3: Summary of Submissions

ICANN org thanks all the contributors for their valuable input and feedback. All comments will be taken into consideration.

### Comments related to Balinese script Second-Level Reference LGR

PANDI expresses its full support for the Balinese script reference LGR. The adoption of these rules is a crucial step toward ensuring accurate and consistent digital representation of the Balinese script within Second-Level Domains (SLDs), which plays a vital role in preserving and promoting Balinese cultural heritage online. This work expands the accessibility of the Balinese script in digital spaces, supporting its use for social, educational, and professional purposes.

DR, RF, and MF comment that the Balinese script reference LGR provides a good explanation of character forms, consonants, punctuation, and rules. They support the use of Balinese script on the Internet and share that the Javanese script experts can learn how to develop the rules based on the work done in the Balinese script reference LGR.

CP supports the Balinese script reference LGR. CP emphasizes that the consistent and accurate use of the script is a solid foundation for the culture to grow and thrive in the increasing digital world.

The 16 comments, received from IK, IM, NK, SA, NL, AW, IKD, IW, NKP, IG, SG, BY, AI, KS, JI, and DP, express their full support for the Balinese script reference LGR and note that they hope this work will contribute to the broader efforts of standardizing and strengthening the digital infrastructure needed for the Balinese script on the Internet.

The 10 comments from DD, DM, DPS, MF, MS, MFP, JIS, RH, and RHE express their full support to the Balinese script reference LGR and its adoption.

---

YG fully supports the use of Balinese reference LGR script which will be the first of other 30 scripts used in Indonesia.

RA notes that the Balinese script reference LGR is the important step for digitization of Balinese script and look forward to its implementation.

### **Comments related to Inuktitut language Second-Level Reference LGR**

PQ, the geo TLD of .quebec, comments that the rules provided in the Inuktitut reference LGR are sufficiently flexible. The contextual rules restricting some code point sequences increase security and stability level.

In addition, PQ notes that the Inuktitut reference LGR will open the door to inclusiveness for Inuit population in the Domain Name System (DNS) and a step toward achieving the Universal Acceptance goal. PQ thanks all the multistakeholder parties, and the communities involved in this work.

TA comments that the effort in developing the Inuktitut reference LGR allows Inuktitut syllabics users to be able to register their domains in Inuktitut syllabics.

TA notes typo found in the supporting document. The word Aivilingmiutut (⟨ΔΔΔ␣<sup>ˆ</sup>Γ>␣<sup>ˆ</sup>⟩). The ␣ (lu) should be a ␣ (li). TA further raises that the Unicode names of some code points may not align with the Nattilingmiutut phoneme.

CIRA welcomes the initiatives to ensure that the DNS is reflective of linguistic diversity in Canada and globally. CIRA recognizes the importance of developing new LGRs and subsequent IDNs to help ensure that people can navigate the Internet in their own language.

MA provides feedback that the Inuktitut reference LGR is of high quality as far as Nunavik Inuktitut is concerned. The LGR represents an important step toward the usage of Inuktitut language on the Internet.

TM mentions the use of character rai in Nunavik and suggests the same typo correction as TA. TM further suggests that the the rules should prevent character <sup>ˆ</sup>, <sup>ˆ</sup> combination and <sup>ˆ</sup>, <sup>ˆ</sup> combination as these may look like <sup>ˆ</sup> and <sup>ˆ</sup> respectively.

### **Comments related to Myanmar script (Full-Variant) reference LGR**

PTL shares that the Myanmar script (Full-Variant) reference LGR has been reviewed and there is no further feedback.

## **Section 4: Analysis of Submissions**

ICANN org thanks all the contributors for their valuable input and feedback. All comments will be taken into consideration.

---

ICANN org notes that there are no updates suggested for the Second-Level Reference LGRs for Balinese script, Thaana script, Myanmar script (Full Variant Set), and Spanish language.

Regarding the suggestion on Inuktitut language Reference LGR to prevent a few character combinations, it is confirmed that the current rules in the Inuktitut language Second-Level Reference LGR are aligned with the suggestion. The typo correction will be incorporated in the final version of the Inuktitut language Second-Level Reference LGR.

## Section 5: Next Steps

After consideration of the comments, and modification as needed, the final version of the Reference LGRs will be posted on the [Second-Level Reference LGR web page](#).