Public Comment Summary Report

gTLD IDN Tables Review Process When Reference LGR is not available

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Closed for Submissions Date:
Thursday, 12 September 2024

Summary Report Due Date:
Thursday, 3 October 2024

Category: Technical

Requester: ICANN org

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Open Proceeding Link: https://www.icann.org/en/public-comment/proceeding/gtld-idn-tables-review-process-when-reference-lgr-is-not-available-01-08-2024

Outcome:

ICANN org appreciates the comments submitted by the community on the Proposed Process to Review gTLD Internationalized Domain Name (IDN) Tables Without Reference Label Generation Rules (the "proposal"). ICANN org received five comments on the proposal. The comments do not provide any opposing views to the proposed solution, and some comments suggest some possible enhancements to the process.

Based on the input received, ICANN org will finalize the Process to Review gTLD IDN Tables Without Reference Label Generation Rules and will proceed with the implementation.

Section 1: What We Received Input On

Reference Label Generation Rules (Ref. LGRs) are developed by closely working with the relevant language and script community. Ref. LGRs are then used in reviewing IDN tables submitted by the gTLD registries through the IDN services or Registry System Testing (RST). ICANN org has also developed and launched the IDN Table Review Tool to further improve transparency and consistency of the gTLD IDN table review process. This self-service tool allows Registry Operators (ROs) and Registry Service Providers (RSPs) to evaluate their IDN tables using the Ref. LGRs before submitting to ICANN org for review.

There were 26 script-based Ref. LGRs published and ICANN org was able to review IDN Tables in hundreds of languages written in these scripts. However, there were 161 scripts encoded in

Unicode standard and many scripts did not have Ref. LGRs available. Feedback was requested on the Proposed Process to Review gTLD IDN Tables Without Reference Label Generation Rules.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
NIC Comercial	Jean Henrique	NC
NIC Latin America - LatAmm.com		LatAmm
At-Large Advisory Committee		ALAC
Registries Stakeholder Group		RySG

Individuals:

Name	Affiliation (if provided)	Initials
Simon Ohuche	Internet Society Nigeria Chapter	SO

Section 3: Summary of Submissions

ICANN org received five comments on the proposal.

"NC" recommends that ICANN org develop a system for automating the IDN table submission. And the registry should assume responsibility for developing LGRs. (Translated and summarized from the original submission in Portuguese).

"LatAmm" recommends that (1) ICANN org should use Artificial Intelligence to develop IDN tables and validate IDN labels, (2) when Ref. LGRs are not available, gTLD registry operators should take responsibility for developing their own tables, and (3) ICANN org should coordinate with the community to set the standards for registries to develop their own IDN tables. (Translated and summarized from the original submission in Portuguese).

The ALAC appreciates the opportunity to comment on the proposal and notes that Ref. LGRs are essential for preventing end-user confusion and ensuring the security of domain names.

The ALAC further notes its strong support for enabling any community to have its entire online space in its own language. Therefore, having a process to develop Ref. LGRs for unsupported scripts is critical. The ALAC suggests that ICANN org should incorporate a mechanism to incentivize timely completion of Ref. LGR development, e.g., setting milestones and target timelines as guidelines to ensure the process progresses efficiently.

The RySG appreciates the opportunity to comment and supports the proposal. The RySG notes that the proposal was a collaborative effort between the RySG and ICANN org staff and RySG looks for balancing the business and technical goals to continue supporting deployment of IDNs at the second level while maintaining uniformity of IDN table review processes.

"SO" comments that without Reference LGRs, the custom IDN table development introduces significant complexities, including risks of security vulnerabilities and operational instability. To address these challenges, "SO" recommends ICANN org consider (1) using Artificial Intelligence technology to validate IDN table where Reference LGRs do not exist, (2) using automated security auditing to proactively detect potential threats from introducing new script to the domain name system, (3) establishing Reference LGR development framework, and (4) establishing a dedicated IDN development support program, technically and financially, for emerging markets.

Section 4: Analysis of Submissions

ICANN org thanks all the contributors for their valuable input and feedback. All comments have been analyzed.

ICANN org appreciates the supporting feedback from the ALAC and the RySG.

The following outlines the feedback for each topic raised.

Role and responsibility for developing the Ref. LGRs
It was raised by "NA" and "LatAmm" that registries should be responsible for developing the Ref. LGRs. This is aligned with the proposal stating that *"ICANN org will work with the RO and the relevant language and script experts (as identified by the RO) and will work with them to develop the Ref. LGR."*

Technology used for IDN Table review and IDN implementation
The process automation and Artificial Intelligence were suggested by "NC", "LatAmm", and "SO". ICANN org uses the Ref. LGRs and the IDN Table Review Tool for streamlining the gTLD IDN table review process which deem to be sufficient. We welcome any specific suggestions to improve the tool, which can be submitted to IDNProgram@icann.org.

"SO" also suggests proactive detection of potential threats from introducing new scripts to the domain name system. This is taken into consideration when the Ref. LGRs are designed in collaboration with the relevant language and script community.

Ref. LGR development framework
Based on the ALAC's suggestion that ICANN org should incorporate a mechanism to incentivize timely completion of Ref. LGR development, ICANN org will update the Guidelines for Developing Reference LGRs for the Second Level to include suggested milestones and timeline.

IDN development support program
As raised by "SO" that ICANN org should establish a dedicated IDN development support program for IDN development. The IDN program at ICANN org is already dedicated to supporting the language and script communities to develop the Ref. LGRs.

Section 5: Next Steps

As next steps, ICANN org will proceed with the implementation of the proposed Process to Review gTLD IDN Tables Without Reference Label Generation Rules.