
SAN JUAN – IDN Implementation Guidelines Working Group Update
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UNKNOWN SPEAKER: This is IDN Implementation Guideline to Working Group. March 12, 2018 in room 208A. Event start time by 3:15pm [AUDIO BREAK]

Test test. Test test. I think so. [AUDIO BREAK]

MATS DUFBERG: Welcome to the IDN Implementation Guideline Working Group Update. I am Mats Dufberg, one of the two co-chairs. The other one is online. Next picture please. Here is the agenda for today. I will go through the purpose and status of it -- the working group itself, scope, especially the second common public responses that we are giving and the comments that we got and the response to those. Yes.

Next step and questions. So, background is that there is already a guideline since many years back, so this is working on an update of that. And the purpose of the guideline is to give policies and practice for second level IDN registrations. So this is not about the root zone, this is about the second level. And the purpose is to minimize risks and cybersquatting, and also

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reduce risk of consumer confusion. These guidelines are required by most registry agreements. Definitely required by the new gTLD registry agreements, and it's also relevant for any other TLD, including IDN ccTLDs but also ordinary ccTLDs because this is not about if the TLD itself is IDN, it's about the registration below it and that could be IDN, independent on the TLD itself.

So, next slide please. So, this is the progress of the working group. So it was formed in 2015, and we have had two drafts out for public comment. So the second draft was out for ICANN 60. And that is what we are processing right now.

So, next slide please. The group comes from various stakeholder groups. From ALAC, ccNSO, GNSO and SSAC. Yes, and different organizations. So, I come from the ccNSO world.

Next slide please. So, the scope of the document is the owner name -- the name that is registered, is added in the zone through the registration. We're not concerned about any name server names that are indirectly added through the registration. And we have divided the recommendations into different topics. We have transition, which is transition from old IDN 2003 to 2008. We have format of IDN table, where LGR is the natural recommendation. Consistency of IDN tables and practices, where we focus on various implementations that might -- should

be more consistent, and also between tables under the same TLD. Variants -- IDN variants, and how they should be treated. Similarity of confusability; so this is a big issue and very complex. Publishing idea and registration publishing rules, that's for the registry to follow, and terminology. I'll try to scroll to the next -- oh, you do that, okay. So, this is the comments for the second public comment that we sent out last fall. So these organizations and individuals have submitted comments that we have processed and have replies to.

So, next slide please? They have two comments that they have sent us. First one is that they look forward to engaging, and I think that it's very promising because we see that the industry should engage more into the future changes and development of IDN tables and policies. So, our reply -- well, you can read it, they're comments. So, we welcome that. And the guidelines, they suggest the community collaborate. So of course, this depends on the industry to do work, this is nothing where we can enforce anything, we can only encourage.

So, next slide please. So, this is a comment from JPRS, the .JP registry. So, they comment that Japanese writing use different scripts -- different Unicode script, Hanzi script, Hiragana, Katakana. So they recommend that the guidelines should clearly express that the case of any exceptions made, allowing

scripting, of script, means the case of comingling the scripts that are used exclusively. So, our writing, about mixing script, was maybe a little bit confusing. So we don't see the Japanese using the different script as exception. That's the rule for Japanese writing. So, for Japanese writing, it's certainly okay to use script mixing. When we talk about script mixing, is that we want to -- that we recommend against, that we will not allow, is this script mixing, which is not naturally occurring. Like, mixing Latin and Cyrillic script. So we have -- we will update the language in the guidelines to clarify that the Japanese mixing is not something which is considered the exception, this is the natural rule.

Next slide please. So, this is from ICANN Business Constituency; they believe that all register operated offering IDN labels should incorporate the guidelines and we definitely agree with that. It will, as I stated before, be enforced by certain registry agreements. The ccTLDs do not have such an agreement, but we, of course, think that they should also use the guidelines as the best current practices. They also want to encourage collaboration, and -- let me see -- basically suggest that security has a bit of issues in this context, should include the risk of increased DNS abuse posted by malicious activities, such as spam, malware, and phishing. And we don't disagree such, with the BC, but we don't think that is in the scope of the IDN

guidelines. So this is -- the IDN guidelines cannot cover all problems and issues. This is for other policy groups to look at.

So, next slide please. This is still the Business Constituency group; BC four and BC five, they just support what's in the guidelines. And in BC six, they want writing for the principle of minimizing IDN variant label allocations. So, they think that it should be recommended that there are not too many variants graded. So, we agree on that, and we will update the guidelines to emphasize that not too many variants should be created -- or, activated, I should say. Created is one thing, and activated is another thing. I think that if anyone wants to -- better, if anyone has a comment or anyone wants to discuss any of these issues here, please, do so. If you want to go back to some of the previous ones and have a comment, please raise your hand. It's better than taking everything at the end, I think.

No comments so far? And also Dennis, if you want to add something, please do that. So, next slide please. So this is the last comment from Business Constituency. So they -- in BC seven and BC eight, they agree with the writing, so I don't think it's so much to add there. And BC nine, talk about minimizing [inaudible]. And we will update the wording in that direction.

Next slide please. So this is -- these are comments from the Registry Stakeholder Group -- RySG. In the first comment they

want a definition of security -- of stability. Which is quite problematic, because those terms are used in various places in agreements and the working group does not think that we should give yet another definition of it, but rather use the terms in the more natural sense of it. So, we will not do an update based on that.

Next slide please. So, in comment number two, they note that we lack a definition of same registrant, and we agree, so we'll update the same registrant is considered the one who registered the primary label. The implementation they should've left to the registry, therefore the requirements for same name server is not added guidelines. Okay, they also want variants -- they want to have a rule that says that variants should be delegated to the same name servers as the primary label. The working group came to the conclusion that it doesn't decrease the risk of cybersquatting if you do that, instead it limits the possibility of the registry to create a good solution. We shouldn't dictate the way they use the variants. Just because, it delegated the same service doesn't change anything as such. So, we don't want to add that limitation.

Next slide please. This is continued for the Registry Stakeholder Group, and the guidelines want to see the new IDN table format defined in RFC 79.40 as the standard, and that is the LGR format

-- Label Generation Ruleset -- and this LGR format is the only existing standard IDN table format that allows the inclusion of all information needed for the IDN table. There are two other formats defined in non-standard RFCs; neither of those two formats permits the inclusion of contextual rules, which are necessary for all IDN tables. Those contextual rules must be defined outside in a non-standardized format.

So the LGR format is the only format that is defined in a standard document, and the only format that includes everything needed. Therefore, the guidelines working group sees the LGR format, so the only future format for IDN tables. Our Registry Stakeholder Group wants to make that optional. We disagree on that; we insist that the LGR format should be the format for future IDN tables, and eventually we want to see a transition of course, but that's a different story.

On the other hand, we understand that it will take a while for a registry to migrate into the LGR, especially if you want to take use of the power of LGR -- the LGR table can be used in the implementation, but also at displaying the content of the table. So we agree to give the registry 18 months to implement that, as suggested by the Registry Stakeholder Group. So this is an important part of the guidelines, and something where it's been a discussion, and what we'll also see is some reluctance of the

registries to meet that. Anyone want to comment this? Is anyone here that is representing the registries?

Okay, let's go to the next slide please. The next comment, number five, they also talk about an 18 month transition of the guidelines. We understand that, and see that it'll take time for registry to migrate, so we'll recommend such a transition period. And then number six, last from RySG. So, they want to add definitions of blocked variants, and whole label evaluation rules in the terminology part of the guidelines, and we will review and update as needed. Good suggestions.

So, next slide please. Anyone want to discuss anything on the previous...? The next set of comments is from the Non-Commercial Stakeholders Group; NCSG. I'm sorry, I -- for the first comment of our next section... This is kind of out of context, so I cannot comment it. For their comment -- yeah, okay, no, I know what it is. It's the other names that are added to the zone; the name server names, and we don't see that as part of our scope to have any opinion of that and we refer them directly to ICANN -- other parts of ICANN to discuss that. They suggest four to six months for implementation. We've already discussed that, we think it's necessary to meet Registry Stakeholder Group and give 18 months for implementation. So that will meet the NCSG's suggestion with good margin.

So, next slide please. So, in many cases the working group wants to see something like cooperation in industry and other related issues, where we don't think that we can mandate such a thing, so we have chosen "encourage" instead of "should". If it's "should", it's binding through the contract. And NCSG wants to raise that to "should". We don't think that it is possible, so we suggest staying with the "encourage". Yes, Bill?

BILL JOURIS: I suspect that they're -- oh, Bill Jouris, speaking for myself. I suspect they may be thinking of "should" in the sense that the IETF RFC use it, where "must" is a requirement and "should" is a recommendation, and I think that may be where they're coming from here.

MATS DUFBERG: Well, in the RFC actually, "should" is something you must do, unless you have an argument against it. So it's -- the "should" in RFC is stronger than a recommendation actually.

BILL JOURIS: But it's still short of "must".

MATS DUFBERG:

Right, it is, but it's too strong. And, secondly we do not use the "should" here in the RFC sense because we cannot refer to the RFC since the RFC is for implementations only, and this is not an implementation. Thank you.

So, next slide please. Then we have comments from individuals -- well, Dusan expects ICANN to help an active role in guidelines two to nine. So the guidelines are part of the contractual obligation for those TLD's that have such contract, and of course ICANN will make sure that it's enforced. And for other TLD's, it's probably better for the relevant support organization to work on that. So for ccTLD's, it's probably better ccNSO or something look at that. So, he also recommends we define the use of "must", but we don't want to have a new definition of "must", and we can't use the definition in the RFC. We try to use it in the more regular sense of the word, we think that should work.

So, next slide please. Again, we have a recommendation to -- or comment to use "must", instead of "encourage". So we have discussed all places where we have -- some place we have "should", other "must", and third set of places we have "encouraged". So we have balanced what we think the working group and ICANN can require from the registry and more where it's trying to push the behavior. So then the four about the six months of implementation, but we have updated that to 18.

And then we have a comment from John Gutierrez, who suggests that dot -- I don't know, should we be .home or .hom. Home, and they should be reserved. And such an action is completely out of scope of the IDN guidelines working group. I'm not sure which body but it could be IETF or -- yeah, IETF maybe that could do such an action, but definitely not this working group.

So, next slide please. So this is a comment from Anton Berchansky. He notes that the IDN tables are more numerous than necessary. There are different Hebrew IDN tables and different Ukrainian IDN tables. So he suggests that it's recommended to remove IDN tables that are proper subsets of others. And this is also out of scope for the IDN guidelines workgroup, to suggest retiring IDN tables, but of course it's an interesting comment. So this is a work for the registries, and hopefully in the future we will see fewer variants of IDN tables for the same purpose. Fewer IDN tables for say, Spanish, or Hebrew or something.

Next slide please. Here IAB talks about home script Cyrillic homoglyphs for usual asking, and this is an issue that we have covered in the guidelines, that it's important to look at the possibility of creating domain names in different scripts, under the same TLD. Domain names that are built up on different code

points -- technically different domain names, but have the same appearance. So that is covered in the guidelines. So we don't need anything further. Yes.

Next slide please. So the next step for the working group is to finalize the guidelines, which will be version number four. The final version will be sent to the ICANN board for consideration. And here you have links to the resources, and of course feedback can be sent to the emails listed on the slide.

Yeah, next slide is just a thank you. Any questions or comments? You're just raising your hand? Anything in the chat? Dennis, please?

DENNIS CHANG:

Mats, do we have a sense of when the working group will be able to finalize these guidelines and present them to the ICANN board?

MATS DUFBERG:

Well, the pace is quite slow. I have to make -- Dennis is also on the group. By the summer? What do you think? Okay, so, Edmund, who is also on the group he writes in the chat box, "I think we should target to get it done before Panama." And

Panama is somewhere in June, so yes, I agree. We should target for before that. If there are no more comments -- yes?

MICHEL SUIGNARD:

This is Michel Suignard from the IP. My only comment would be really, that on this transition period on the fact that the registry wants to keep the existing IDN tables, there seem to be different levels of IDN tables out there. There's the one that -- the simple rapporteurs where the rules to create the IDN are pretty simple. I'm thinking mostly Latin based IDN tables. The one you really don't want to let loose for too long are the ones that are basically unsafe unless you have really express rules in them.

I'm thinking for example anything to do with South Asian tables because if you don't use NGR you would have no way to express -- to create IDN tables for those scripts safely. It's just a major security risk if you don't implement NGR for some of the IDN tables. So while I have some sympathy for the thousands of IDN tables they use for languages -- especially for Latin languages, I have much of that sympathy for IDN tables that are currently covering script that do require a lot of expertise to do additional work on IDN tables.

MATS DUFBERG:

I hope that you don't get disappointed when I tell you that the guidelines do not require that everything is converted to LGR in 18 months. In 18 months that's the time when they will be required to submit new tables in LGR. I think that the text tables are like before, we'll have to live with them for a long time. Hopefully registries that do start using LGR will see that it's better to use LGR only, and themselves do a conversion to LGR.

But there will definitely be many that will take a long time to do any conversion. Unless there is some pressure from something else -- maybe the registrars, I don't know -- that could put the pressure. There's a comment from Edmund again, "In response to Michel, we did consider the issue and in fact as you have mentioned, the ability to convert it into LGR format should not be overly burdensome for possible comparison, and therefore we sided towards leniency."

Yeah, just a comment on that. The problem is maybe, not to convert your table as such into LGR, but to convert your system so that you use LGR in the system. If you only have LGR showing to the public and not use LGR in your system, you don't fully utilize the strength of LGR. Yes please?

HIRO HOTTA:

Ah yes, thank you, my name is Hiro Hotta from JPRS. Can we go back to the JPRS comment? Yes, I'm not in the team who made this comment, but I heard from [inaudible] in this team that he

wanted to say more about this in his comment. So maybe it was due to his improper English, but he wanted to say, as far as I understand his idea, he wanted to say that in Japanese three scripts are used comingly. So they are allowed to comingle, that's one thing.

And the second thing that he wanted to say was that those three scripts must be considered to be one script collectively. That means that inside that set which consists of Hiragana, Katakana and Kanji, there's no concept of cross script in Japanese scripts. That's what he wanted to say. Maybe [inaudible] know about this. I know there's an argument on this but I just wanted to say that his intention was that.

MATS DUFBERG:

Thank you. What we base our work on is the way that Unicode has laid it out. In Unicode it's defined as different scripts -- three different scripts. This is nothing that we can change. I cannot change it and the working group cannot change it. That's how it is. We recognize that Japanese writing uses these code points -- one set of code points as three different scripts -- as one unit, so we don't see that -- we don't consider the use of these three scripts as an exceptional mixing. That's a natural mixing that is done for Japanese. So we cannot further it with that comment.

MICHEL SUIGNARD: Again, Michel from IP. There's in fact -- there's a Unicode definition of scripts and then there's the LGR definition of scripts. So LGR in fact has a special format for that in the header. One of them is Japanese -- I can't remember the exact abbreviation for it, but it really could be defined as a mix of free scripts.

Basically, if you want a umbrella definition for LGR for both Japanese and Korean for that aspect, where you can define Korean as mixing two Unicode scripts, and Japanese as mixing three Unicode scripts. So there's in fact a formal way, even within LGR to address that concern. It's not true what we see in Unicode that the legends of LGR format, you can do that because it is in fact a script definition that do include multiple scripts, especially for Japan and Korean.

MATS DUFBERG: Yes, and that umbrella is useful for some writing in LGR, but this -- the guidelines are kind of not part of the LGR definition, it's above because we also have to take other IDN tables into consideration. So we base it on the Unicode definitions.

AMANDA FESSENDEN: So, this is Amanda, I'm reading Edmund's comment in the chat, "In response to Hiro, we encourage your team to provide further response directly to us as we finalize the IDN guidelines. More importantly, we agree with the JPRS comment in general. In terms of mixed script or not, we will most likely need to follow the Unicode conventions, however in this specific case, as with the IDN guideline versions in the past, we should figure out a way to word it properly. Example, language, scripts etcetera. Again, I encourage the JPRS team to provide further wording as we finalize the guidelines." And then he also followed up to agree with Michel and it is consistent with what he was suggesting.

MATS DUFBERG: And what else? More comments? Then, thank you very much, we are closing this session. If you are more interested you can go to the website and look at the material there. And, see you next time. Also thank you for those listening.

[END OF TRANSCRIPTION]