
ICANN Transcription

IDNs EPDP

Thursday, 20 July 2023 at 12:00 UTC

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DEVAN REED:

Good morning, good afternoon, and good evening. Welcome to the IDNs EPDP call taking place on Thursday, 20 July 2023 at 12:00 UTC.

We do have apologies from Maxim Alzoba.

All members and participants will be promoted to panelists. Observers will remain as an attendee and have view access to chat only.

Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. If you need assistance updating your statements of interest, please email the GNSO Secretariat.

All documentations and information can be found on the IDNs EPDP wiki space. Recordings will be posted shortly after the end

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of the call. Please remember to say your name before speaking for the transcript.

As a reminder, those who take part in the ICANN multi-stakeholder process are to comply with the expected standards of behavior. Thank you, and back over to our chair, Donna Austin, please begin.

DONNA AUSTIN:

Thanks, Devan, and welcome everybody to today's call. We will focus a little bit on really around 8.1 today. Just by way of updates, there is a council call that will happen about eight hours after we finish our call today, maybe a little bit earlier. And we're on the agenda to provide an update on the timing for our work. You'll remember that in D.C. there was quite a bit of discussion around the timing for our Phase 2 work. So I'll be reporting to council that basically we're improving that by about 12 months. So hopefully that will be taken positively.

The other thing I wanted to do before we kick off is we have [inaudible] joined the leadership team. Daniel is from ICANN staff and is replacing Emily, who's no longer part of this work. So, Daniel, welcome. I don't know if you wanted to say hello to the team or not, but feel free if you would like to.

DAN GLUCK:

Sure. Thanks, everyone. Thanks, Donna, for the welcome. Happy to get working on this.

DONNA AUSTIN: Terrific. Thanks, Daniel. And is it Daniel or Dan?

DAN GLUCK: Up to you.

DONNA AUSTIN: Okay. And that's the first time I've heard Dan's voice. So there you go. So we all know what he sounds like now. All right. So with that, I think I'll just check in with Ariel. Is there any other update that I had to provide, Ariel?

ARIEL LIANG: This is Ariel. I don't think so. That's all.

DONNA AUSTIN: Okay. Great. All right. So let's get into today's discussion. And I'd really like folks to go into this with a bit of an open mind. So on the leadership call last week, we had a pretty open discussion about the ICANN Org comments on a number of our recommendations. And we kind of challenged ourselves, I suppose, about whether our recommendations, one, are consistent in terms of being conservative and whether we needed to have a pretty frank discussion amongst this group.

One of the concerns that I have as chair, and because I seeing this happen a little bit with some of the recommendations that come out of PDPs, is that when they get to the board, recommendations can come undone. Because the board may have a different view of things, or the board may pick up on

recommendations that they think or to them seem inconsistent. And then that becomes a little bit of a circular discussion with the board kicking recommendations back to the council to ask questions about, is this what was really meant? Or do you know what happens with this? So I don't want our recommendations to fall into that, what's the best way to describe that, to fall into that category. I want us to really think about our recommendations. And we have along the way talked about our recommendations being implementable. I think we have identified at some point that we need to ensure that our recommendations are consistent and that one recommendation doesn't undo another one or compromise another one. And I think we've done a reasonable job at that.

But in light of ICANN Org's comments, I think we can, this is my, as your chair, but also from a personal opinion, but I think we can take it as a hint that we really need to look at these things pretty seriously and have a robust discussion around where we are.

So that's kind of a bit of the background and the thinking to why we've structured the discussion or the deck today the way that we have. And I'm really asking that if folks can be pretty open going into this and really challenge ourselves about these recommendations and whether they are consistent and whether we are being true to the principle of conservatism.

And also, Ariel, if you can go back one slide. You know, one of the things that we have been cognizant of is the security and stability of the DNS. And I think we're all aware that what we're doing by introducing variants at the top level is that it's very much an unknown from many perspectives because we don't know how

many IDN GTLDs will be applied for in the next round. And as a result of how many are applied for, we'll test that, the permutation and the possibility for increased confusion and also that security and stability element of the DNS. So with the conservative principle, we're talking about a more cautious approach and identifying ways to limit any potential security and stability risks.

So that's the setup. So as we go into this discussion today, let's see where we get to and see whether we do need to rethink some of our recommendations or whether we're quite comfortable with the way that they're sitting. And that's fine as well. But I really want to be sure that we have this discussion. I don't want to hide from it. I think it's important that we have it. And if we are supporting the recommendations as they are, then it's on the back of a pretty robust discussion that I hope we can have today. And if we don't, if we decide that, well, perhaps we should rethink some of our recommendations, that's equally as good, I suppose. But I'm really keen to have this conversation.

Our board liaisons, I suppose, for Edmon and Alan, any insight that you may have from a not so much personal perspective, but more from a board and how the board works perspective, might be insightful for this group. So that's kind of the setup. And Justine, I don't know if there's anything else that you would like to add, but this is why we're basically expecting that most of the discussion today is going to be around recommendation 8.1 and then a couple of others, which I can't remember because it's not on the screen in front of me. So I guess with all that, I've done enough filibustering around this. So let's get going on this.

So before I get started, any concerns as to what I've raised or the discussion I want to have today? I will note that Nigel has put in chat that he's never liked conservatism as a principle. Nigel, as your hand is up, I'll let you speak for yourself. Thanks.

NIGEL HICKSON:

Yes, thank you very much. And my view is very much of a, not philosophical, but sort of high level view. Yeah, I mean, don't take too much notice of what I say at all, but I am worried about the wording of the conservatism principle. It says adoption of a more cautious approach as a way to limit any potential security and stability risks. I mean, I find that not right. I mean, not right in English anyway. I mean, you can never limit any potential security and stability risks. I mean, that means that you do things that are totally secure and stable, which is not what we're about. I mean, this is partly about innovation, and that's why the conservatism principle has to be balanced against other principles as well. It's not the only principle we should be following. Thanks.

DONNA AUSTIN:

Thanks, Nigel. That's certainly a fair point. But I think the recommendations that we're going to look at today, I think the principle of conservatism is probably the most important that we need to look at. And just to be clear, what we're talking about here is the ceiling and some of the recommendations that we had around the number of variants that you can apply for with basically the same fee as applying for one TLD. So they're the recommendations that we'll be looking at. Dennis.

DONNA AUSTIN:

Thank you, Donna. I'm still processing my thoughts here on these comments. So what I'm saying, just a reaction of it and trying to put my thoughts together from the past conversations about the conservatism. If I'm not mistaken, to be honest, I think this ICANN Org comment was focused on the arbitrary number four that we came up as a means to when an applicant decides to activate variants for—it's kind of the number that we land on and that that would potentially not be aligned with the conservatism.

So my concern is that we're looking at conservatism through a very narrow lens or focusing too much on that number of variant. And just want to bring up again a few items here, because I think when we were discussing this, being conservative, it's not just one answer to the conservatism principle, which is the number, but also the other rules that we are going to put in place, such as the same entity principle in order to contain those potential risks.

As we know, variant TLDs, that's a policy concept. There is no such thing as a variant domain name in the DNS, right? You input a DNS record, everything is a single independent entry in those zones. Root zone, TLD level, second level, you name it.

And so by ensuring that the same entity is managing those domain names at each of those levels, that's minimized risk, right? Like managing domain names across different registrars or registries or what have you. And that's one thing, right? The same entity principle checks here or helps being conservative. That's one point.

And the second point is, I just want to stretch a little bit what is written in the second box. And I don't want to get into philosophical discussion that domain names they add to the security and stability of the DNS. Because if you take the variant domain name concept further, those really exist today, right? Domain names are deemed the same by end users. Those exist today, right? You know, take the singular, the plural, the exact second level domain name across different TLDs. Those, if you take the variant definition to extreme, those exist today. And I don't think, I mean, there are issues, confusability issues for sure. But they do not pose a security and stability risk to the DNS. I would offer that.

The variant, as we are talking about within the remit of the root zone LGR and IDN tables and such has a special consideration. And that's why we're discussing here and coming up with certain policies to manage that complexity, right? And I think that's the key word, how to manage the complexity, the operational complexity.

And again, we're going back to the same entity principle. That's what minimizes those issues. And I say minimizes, they do not eliminate. Because at the end of the day, the registrant, the user of that domain name, they are going to decide what they are going to put up in those domain names, right? What services, websites, what happens, right? And nobody is going to be checking what those registers are doing without the domain names outside being managed by the same registrar or certain controls. But at the end of the day, the user experience is going to be decided by the registrant. And if they decide to put up different websites, and then

it's up to them. Is that going to cause security instability of DNS? I would argue not.

So, again, this is all to say, the long way to say that we are focusing too much on the number and not taking into account the different aspects of balancing these conservatism principles, but all the other tools and requirements and positive recommendations we're putting around in order to keep those operational risks in a controlled manner. I hope that makes sense. But, again, I'm trying to find the right thoughts here. But I think we're focusing too much on the number and not the other items that we've discussed, such as the same entity principle, which is, I think it's a powerful method in order to keep the complexities in check. Thank you.

DONNA AUSTIN:

Thanks, Dennis. And I think the points you've raised are important for the narrative. And what I'm hoping with this discussion is it's not only about our recommendations, but it's the rationale to support them. So whether we need to think a little bit about the narrative we've set around these things to ensure that it is a good story for want of a better word or phrase. So, keep those thoughts in mind as we kind of work through where we're going to go today. Sarmad.

SARMAD HUSSAIN:

Thank you, Donna. So I have a few things to say. I think, first of all, totally agree. Conservatism principle is only one of the multiple principles. Even if you go to RFC 6912, it lists multiple principles

and there needs to be a balance of everything. But, of course, conservatism principle in its own right is important and useful and something one should also aim for.

So eventually, when we declare variants, the security side of things are already to a very large extent addressed. And then, of course, we have other mechanisms like string similarity review and those kind of things. So, with variants defined and some of these other aspects built in, security is really something which is addressed.

What I think in this context, we are trying to address is not really the security aspect. We're really trying to address, in some ways, the usability aspect or what SSAC called the manageability aspect. Because what they said was that when you have like four, let's say, variant TLDs at the top level, and then you have four variants of a string at the second level, then let's say you have the same string, so you end up four times four, 16 domain names against one domain name, which you wanted. Or sure, I think Dennis said that eventually it is up to the registrant to decide how many of those 16 options they want to turn on the switch for. But that's not the only consideration for two reasons.

First of all, if there are all these, of course, possibilities, it will certainly make a decision for registrations for registrant a little difficult because they will obviously not be able to understand all these variations clearly. But also in the IDN guidelines, which have been approved, for example, there are certain communities, script communities, which want to sort of as a community decide that we want to turn on all the variants. And it is part of the IDN guideline, one of the guidelines. So if that is implemented, it means so, for

example, certain script community may say that okay, all TLDs and these may want to turn on all the variants at the top. Second level, so registrant may not always be in control in such situations. And you may be actually a registrant who applies for a string and ends up with 16 strings to manage or eight strings to manage or whatever that number is.

So it's really a management question or management challenge, which we are trying to resolve. And that challenge is not only as SSAC reports at a registry or registrant level, but also registrar level. So all three are impacted. So I think just wanted to clarify that we really, I guess, wanted to want to look at it from a manageability perspective, not quite security perspective, because that gets taken on care of when variants get defined.

So next thing is about the number, because I think, at least my understanding is that when ICANN has made that comment, it's not just about the number. Actually, it is a series of things which actually compound the number [decision] as well. So, in the report, which was published by staff sometime back in 2019, which is sort of, I guess, a reference point for me, one of the things which was pointed out was that when we're talking about the number of variant TLDs which can be delegated in the cc space, of course, those get constrained automatically because the string has to, of course, be meaningful representation of the country. On the G side, it was suggested that it will automatically become, quote unquote, a little more conservative, because each application will actually have an application fee. So everybody who is applying will, of course, think twice about applying and then

they'll probably prefer things which are needed versus things which are wanted. Because there's obviously a price tag with it.

But now, I guess, the way the recommendations are written, the price tag is taken away. So it's just not the number, but also that there is the need versus want kind of differentiation is, in some ways, to some extent, at least, taken away because now they can apply at least up to four for free, they can actually eventually apply more with a little more, with more cost. But at least if you're talking about the number four, then there is no constraint in the context of the original staff report, which said that that may actually be a inhibiting factor. So that's also sort of, in some ways, compounding the number four, right? It's not just the number four.

The other thing which is also, in some ways, not being considered is that when somebody is applying for some of these variant TLDs, there is certainly a question on why you need that particular string, but that string is not evaluated, meaning that it's at the end of the day, they may apply for the string for whatever their reasons are, the need versus want kind of discussion may not actually happen because that question is potentially not evaluated, at least the way we understand it is the recommendation.

So the need versus want, the question, the cost of application, the number four. So it's not just a single factor. I think there are three, four layers of these recommendations, which are sort of interacting with each other. Also, the last, I think, point I want to raise is that in some cases, it's sort of pushing from, instead of trying to promote needed versus wanted, I think in some ways, it may work the other way. The way it's structured that if you are sort of not sure in the middle, as an applicant, you have a choice. You

can apply it now and get it for free, or you can apply it in the next round and actually have to pay for it. And if you're in the sort of middle and you don't really know whether you want to get it or not, you will most likely apply for it because you get it for free now. And while you will probably pay later.

Again, some of these, I think, decisions are indicating that this may not be the perhaps most conservative approach. It may still be a practical approach. It could certainly be more conservative. It can certainly be more liberal as well. But those are, I think, some of the considerations which we were looking at as well when we were documenting this feedback. Thank you.

DONNA AUSTIN: Okay, thanks so much. Edmon, and then Dennis.

EDMON CHUNG: Edmon here and speaking personally. So from the explanation from Sarmad, it's been clear that [inaudible] number four or any magic number is not the issue.

DONNA AUSTIN: Edmon, I'm really sorry, but your audio is pretty bad.

EDMON CHUNG: Sorry about that. It's probably my laptop. It's acting up. I will try to come back again.

DONNA AUSTIN: Okay, thanks Edmon. So we'll go to Dennis and then we'll see if we can get back to Edmon. Dennis.

DENNIS TAN: Thank you Donna. I think we're landing on this is an operational complexity issue. So it's management of domain names. But in hearing these last comments and observations, I'm just reacting and some conversations within the Registries Stakeholder Group and other outstanding issues about IDNs that we've been discussing, as well as we want as registries and I would offer, and dare to say, as a community, we want IDNs to be treated as first class domain names.

And so with that in mind, the more we treat IDNs in a special way, and we expect others to manage them differently, we shy away from that principle of treating IDNs as first class domain names. The more challenges, the more requirements, obligations that we put in place to make them different, that discourages adoption or trying to implement. And again, I'm going back to how do we balance conservatism with same entity principle, all the principles so that we, as an industry, as a community see those IDNs being adopted, implemented and used around the world.

We just heard about yes, variants, and then because of the permutation aspect of it, and then how do we deal with that at the registration level, where a registrar potentially has given a domain name, primary domain name, has a number of allocatable variants. So I offer and ask why is that different than a registrar having the option to register multiple domain names across TLD, second level domain names, etc. And then, on the other hand,

with IDN variants, we say, no, sorry, you cannot activate more than two or three or four or whatever number you want come up with. That just doesn't compute to me. We are putting more restrictions to a product that we know the community wants, but we are treating it differently, putting more restrictions. And again, the DNS does not understand that. They're just different entries, independent entries.

And going back to the operational requirements that I believe this IDN is going to put in place again, as a consequence of the same entity, and I think that's a good thing. But going beyond that and going down the road and putting more restrictions, where the registrar will not understand the registrar will, at the end of the day, say, I want these domain names, why do you don't want me to activate those? Because they are treated the same, and these are the things I want to do.

And I envision there's going to be different tools that the registries and registrars will need to implement to support these variant domain names. And we have not talked about these, but we have a part of the group of within the CPH tech ops, and we are having those conversations, and registrars say how do I know the domain name has variants, and how do I know whether I can activate those. So the registrar will have to do certain things in order to provide that information. The registrar will need to know how to ask that information from the registry. So in itself, there are going to be more complex operations, and transactions are going to be more complex just because of that. And that alone, I would offer, will put a pause to registries trying to activate those TLD labels at

the top level, I mean. And same with registrars offering those domain names.

So in itself, there are going to be operational complexity from the get-go that will limit the number of those domain names that are going to be out there. But once they are out there, I just don't see us, and I don't want us to, again, maintaining and keeping that special treatment to IDN just because, I don't know, we are too concerned about the potential risk and confusion, etc. Again, IDNs at the second level have existed for more than 20 years now. Variants, same thing. And I have not seen any study, report or even articles saying that things are not working or there is something to be fixed there.

So I understand what the SSAC report says. But again, the conversations that we're having, the policy recommendation as a set that we are talking about, I think they're going to put in place the certain checks and controls that we want to start with. But the more controls that we put, the harder it's going to be to implement those. And the those that want to provide those services are going to be looking at those with [inaudible] eye to see if they want to do go ahead or not, right? I mean, maybe there are going to be the ones that they want to do best. But, well, I'll just pause there. I think I made my point. Thank you.

DONNA AUSTIN:

Okay, thanks, Dennis. Edmon, if you can try your audio again.

EDMON CHUNG:

So, actually, I agree very much with what Dennis said. And it's very important to not make IDN a second class citizen. And throttling variants would actually do that. I understand what Sarmad is saying. But building on what Dennis said, really the market forces will put a stop to avoid the complexity, but to address the need that kind of what Sarmad is trying to say.

But on top of that, I think the, we talked about that. This issue of motivation like oh I get three free ones so let's get all three really doesn't happen because the applicant will have to justify each and every one of them, and to state how they're going to manage it. If they're not able to do so and say, oh, it was free so you know let's just get it, that's going to render them disqualified from the assessment, they were incompetent in running the TLD. And that is the test, not necessarily one or two or three variants.

So what needs to be put in place is probably what is to be justified for each and every variant that is put in place and also the management And I think Dennis also hinted on that the registries and registrars need to probably update the system managing those variants as well.

And the applicant will be asked I imagine how that's being done. And if they don't have a good answer for it, well, sorry, you're not competent to operate this TLD. So this is the conservativeness principle that that's in play in my mind.

But ultimately one of the things that I did want to ask is Sarmad mentioned that there are many different things that are being balanced, but I do also observe that for example for the ccTLD side of things, there's no particular limitation on the number of IDN

TLD variants. So, how does that work, and perhaps what is being put in place there that is not here, or what is in place there that that we can copy and say that addresses the technical issues that that Sarmad may be maybe concerned about? So, I guess those are a couple of points that I want to add.

DONNA AUSTIN:

So we've got a number of people in the queue so I'm going to let the conversation run. So what we have, and I think that the conversation that we're having is good and I think there's a recognition that we have a package of recommendations here that are intended to be a little bit more, be a little cautious about what we're doing. But also understanding that introducing, being able to introduce IDNs and variants or gTLDs and their variants is a priority for the board and the community and something that has been in the works for the last 10 or 20 years.

So I'll let the conversation run through here, but what we have that you want to see from this deck is a number of ways or options that we could adjust the recommendations to rebalance, I suppose, the recommendations so that they tip more towards being consistent. So what I think we'll do is we'll get through the people that have their hand up now, and then we'll go to those possibilities.

And of course, one of the options available to us is to keep the recommendations as they are, but I think we'll look at the options and see what folks think. So we have Satish, Sarmad, Hadia and Anil. Satish?

SATISH BABU: Thanks Donna. I completely agree with both Dennis and Edmon. The most secure way would have been to have zero variants. But here, we are struggling here to kind of bring out policies so that people can have variants. Now to choke the number by policy, I think is not good enough. And I am completely comfortable with the number that we have proposed now. And I think the key point is what Edmon just mentioned, that the demonstration of manageability, that is where we should bring in the conservatism principle. That is where we should focus. And that is where we should ensure that not a single extra variant can proceed in the application. So the focus should shift to the demonstration of the manageability by that particular applicant. Thanks.

DONNA AUSTIN: Thanks Satish. Sarmad?

SARMAD HUSSAIN: Thank you, Donna. This is Sarmad. I just wanted to quickly first respond to the question on IDN-ccTLDs. So on the IDN-ccTLD side, the variant labels are constrained at the top level by requiring each string, which is a variant of each variant string, to be also meaningful in the official language of the country. So it actually is quite constraining that it has to be in the same language. So if, for example, you have an Arabic name and the variant is in Urdu or Persian, and that is not your official language of the country, that variant cannot go forward. And also that the variant string is also meaningful name of the country. So if it actually, for some reason, creates a variant which the spelling doesn't align with the country name, for example, that variant is also not allowed. So there are a

couple of, I think, restrictions which are built into the string, I guess, evaluation, variant string evaluation for cc process just to answer that.

Coming back to this discussion, I'm not going to add more, but I think we are probably having two discussions here. One, whether the conservative principle is needed or not, I think that's a separate question. And then a second question is whether the current recommendations are conservative. I think we are probably trying to discuss both those questions. My initial comment was actually in the context of the second question, not the first one. Thank you.

DONNA AUSTIN:

Thanks so much. So just on the meaningful representation, Edmon has a note in chat that perhaps we could simply add an implementation guidance to ensure that IDN variant TLDs are meaningful representations of the primary applied force string. And I must admit that in thinking about that, that was kind of what I expected anyway, that if you have a primary string, the variants of that would, I guess it goes to the same entity and some of those other things that we have in place. But maybe this is just an assumption on my part, but I thought that if you apply for a primary and the variants associated with that primary, then they are going to have to be connected meaningfully in some way. So I think implementation guidance is probably a good idea to ensure that that's captured, but that's, maybe it's just my ignorance, but I thought that would be the case anyway. Hadia and then Anil.

HADIA ELMINIAWI:

Hi, this is Hadia for the record. So I do agree basically with Edmon and Dennis that it is about both the need and the ability to manage the TLD. And so let's say, for example, that someone applies, demonstrates a need for only two TLDs, but actually cannot manage those two. Will this be acceptable? Well, no, but if another applicant demonstrates the need for four and actually can manage those four, then this could go through. So it's not really about the number, it's about the need and to demonstrate, the ability to manage those TLDs. And I think our focus will need to be on how do we actually evaluate or identify this need and how do we also evaluate and verify the ability to manage those TLDs.

As for the ccTLDs, as Sarmad mentioned, it needs to be a meaningful representation of the territory. And I guess it does work as a limitation for ccTLDs. However, when it comes to the gTLDs, I'm not sure that it could work as a limitation. However, it's the need and the ability to manage. Thank you.

DONNA AUSTIN:

Thanks, Hadia. Anil?

ANIL KUMAR JAIN:

Thank you, Donna. A very interesting discussion on [conservatism] in this. Now, I have a few points. Number one is that with the new gTLD round, which is going to come, more number of applicants will be under IDN. That is what everybody is waiting for it. So once IDNs are there, definitely the more number of variants will be there.

If we please recall the discussion which we had in the phase one, we are talking about the top level domain as well as we are talking about the second level domain. Now, the top level domain, if we talk about the second level domain, then the responsibility of managing technically and operational point of view of the variants is with the registry, registrars, as well as to some extent with the registrant also.

So it is going to present a very complex situation that everybody has to be very, very careful. I agree with you, with Dennis, that as far as DNS is concerned, the main string and variants are independent. They are not. I agree with you. But at the same time, the complexity of technically managing the whole system becomes difficult.

So I feel so that we should add a principle of conservation in allotting the variant along with IDN. And in case we find that there are issues and those gaps are there and we are able to cover up those gaps, definitely in the next round, which is going to come, not this one, we can remove, relax the conservation principles which we converted to this. This is one.

Second, about the ccTLDs, I think Sarmad and Edmon has sufficiently covered. I just want to inform one more thing. In addition to the meaningful territory, there are other restrictions which are there for issuing a string or a variant. The second one is the script and there should be one language per script. So this automatically restricts the number of variants.

The next one, which is important, is the community. Another one was—am I audible?

DONNA AUSTIN: Anil, I think you're dropping in and out.

ANIL KUMAR JAIN: So what I was saying is that in addition to this, there is a requirement of the community approval for a variant or a string in case of CC. So that approval is very, very critical. It is not a single registry or a single person who apply and get the string as is available in gTLD. So I support the principle of conservatism at this stage in the discussion. Thank you.

DONNA AUSTIN: Okay. Thanks very much, Anil. So I'm just trying to catch up on the chat. So the discussion seems to be around whether or how meaningful representation could apply to a gTLD. I do appreciate that it has a specific meaning when it comes to ccTLDs, but it probably is a way to ensure that the primary and the variants have some connection that goes to the need for the TLD. I think Edmon noted that it's not that difficult to ascertain. And in the 2012 round, there was one question on what the TLD meant and is intended to mean. We just need to evaluate the variant against that too. So maybe there's some options available there.

Okay. All right. So, Ariel, can we just quickly skip through the deck? Okay, so one of the things we did was staff looked at the recommendations and did an assessment on what was conservative or what could be considered not conservative. What we've pulled out here are recommendations that could be considered by some not to be conservative. Certainly the 8.1, the

no ceiling value can fall into that category. The application for four or less allocatable variants, sorry, four or more allocatable variants may incur additional fees. That's discretionary on ICANN. Or an under, it's just one base application fee. And then for existing registry operators from 2012, the base application fee is waived.

So probably where it could be perceived that there's an inconsistency in our recommendations is that I think the rationale for a no ceiling value in 8.1 was tied to cost. And I think Sarmad identified that. So there could be an argument to be made that having the same base application fee for a primary and up to four variants could be considered by some to be inconsistent with the thinking and the rationale for recommendation 8.1. And also, we were pretty arbitrary when we said 3.14 to waive the base application fee. But I mean, that really was in recognition that existing IDM gTLD registry operators have been disadvantaged for 10 years now because they haven't been able to apply for the variants.

So what we want to have a look at now is possible ways that we could amend the recommendations to take away from some of the potential inconsistencies around the conservative approach. And please bear in mind that we don't have to do anything. We can keep the recommendations as they are. But we really wanted to have this conversation to challenge whether this team thinks that it would make sense to change.

And we haven't connected some of the dots that others have connected in terms of, we need to look at these recommendations as a holistic thing. So I don't know that we made the connection with same entity principle. The need versus want requirement, I

don't think we pulled that in. But I think if memory serves me correctly, we're still thinking about the need question and how that will be evaluated. So I think we did get some comments on that.

So from a leadership perspective, there are a few levers that we thought we could maybe use to adjust or calibrate the recommendations a little bit better. But as I said, we don't have to do anything. So what I'd like to do on the back of the conversation we've just had is to walk through those now and see where we get to. So I think that's our next slide, Ariel. Okay. And actually, Ariel, would you mind just walking us through the potential options that we've laid out here?

ARIEL LIANG:

Yes, this is Ariel. So this is really something we put together as a prompt for the group to brainstorm. It's definitely, these are not the definitive path we have to follow. It's just some ideas and the group could consider other ways to address the conservatism issue. And then, as you remember, there were four recommendations are possibly not following the conservatism principles. So these potential paths is to potentially dial up the conservatism in one or more of these recommendations to make it slightly more challenging, I guess, for a variant application. So that's kind of, I guess, to lay out the ground or the general thinking why we propose these paths. And I would just kind of give a quick overview of these four paths and then we can open up the discussion.

So the first potential way to address conservatism is we keep recommendation 8.1 as is. That means 8.1 is about ceiling value.

And then the group clearly said there's no ceiling value needed because RZ LGR already set the limit and there's other factors an applicant has to consider. So we don't change 8.1, but make recommendation 3.11, 3.12 and 3.14 moderately conservative. So these are the recommendations related to number of allocatable value labels can be applied for with the same base application fee. So basically one approach is to lower the upper limit of four to a smaller number to make it moderately conservative. So that's one idea.

And then the second idea is to tweak recommendation 8.1 and make it slightly conservative. So basically set the ceiling value, but set the ceiling value as four because that's the number being referred to in the other three recommendations. And then also think about creating an exception to allow an applicant to go beyond the ceiling value. But that has to be based on a set of criteria and also the applicant has to pay additional fees if it wishes to go beyond four. And I think in this particular scenario, probably the only type of applicant will go beyond four is for Arabic script because the upper bound for the other six scripts that have allocatable value labels is four already. So that's the exception to go beyond four.

And then another component of that is to review the ceiling value recommendation after X number of years, because as part of the ICANN process, there is a review process for consensus policy in a kind of periodic manner. I don't remember the exact years that has to be reviewed, but it's a process. It's a requirement. So in the X number of years, there will be a review of the ceiling value and understand whether it works well and also the exception process,

whether that works well. So that's to tweak 8.1 and make it slightly more conservative.

And then also for recommendation 3.11, that's the base application fee recommendation. Keep it as is. An applicant can still apply for four varying labels plus the primary and then with the same base application fee as any other applicant in that round. However, we can make 3.12 and 3.14 slightly more conservative. So if you recall, they're talking about when you apply beyond four, ICANN may charge additional fees based on its own assessment. So basically change may to must. So make it clear for the applicant that if you go beyond four, you have to pay additional fees and it's not a possibility. It's inevitable. So make these two recommendations more conservative in that aspect. So that's the second idea.

The third idea is basically going one level up in terms of conservatism. And that's the part we think just based on the conversation so far, we may meet some opposition from the group. So first is to tweak 8.1 and make it moderately conservative. What we mean here is that we set the ceiling value below four. So choose a different number, but smaller number. And then at the same time, the path to the IDN, path to will apply here is still create exception process for an applicant to go beyond the ceiling value. It has to be based on certain criteria and then with the expectation that the applicant will pay additional fees. And then also another component is to review this ceiling value after X number of years as part of the consensus policy review process.

And accordingly, the other three fee-related recommendations have to be updated in a consistent manner in that the upper limit

for the free, I guess, allocatable variant label has to be changed to the new ceiling value, something below four, and then also change may to must regarding additional fees an applicant will pay if it goes above the ceiling value. So that's a bit more conservative than path two and path one.

And then finally, there's this one level up and that's the fourth path, which is highly conservative. And I guess this one probably will meet the most challenge to receive any support from the group. So first of all, change 8.1 to lower the ceiling value below four and then create no exception. So basically, there's no way for applicants to apply beyond that ceiling value anymore. However, still [inaudible] the expectation that this ceiling value will be reviewed after X number of years. And then accordingly update the rest of the fee recommendations to the new upper limit of the ceiling value. But because we say in this solution, there will be no exception, then 3.12 will be kind of invalid because 3.12 talks about applicant may pay for additional fees above the ceiling value. But if we create no exception, then there will be no need for 3.12 and it has to be removed. And then also part of the recommendations 3.14 also talks about existing gTLD registry operator applying for more than the ceiling value number of variant labels. So that part also has to be removed because there is no exception.

So these are just some ideas on how to tweak one or more of the recommendations to make the package more conservative. And we kind of lay it out as a kind of starting point for the group to think about. Definitely, there may be additional things we can think

about. So I will stop here and see whether there's any comments and input.

DONNA AUSTIN:

Thanks, Ariel. And this isn't only just about being more conservative in our approach. But it's also we have run a public comment process and we do have comments that have identified some concerns. So I guess what we're laying out here are some options that may overcome some of the comments that we received. So obviously we're trying to develop policy that is consensus based. I'll be honest and say that I don't know what weight, if any, should be given to the ICANN Org comments in terms of doing a consensus call because ICANN Org is not part of this team. It's really expertise that we rely on. So I guess in terms of consensus call, we don't really have to take that into account. As I said at the beginning, I am a little bit worried that if we have recommendations that the board starts to take apart and thinks that they're inconsistent or doesn't understand something, then that undoes the good work that we've done.

So these are some options that we've identified and what's not there is no change, which I guess would be path zero. Perhaps the easiest path would be, not the easiest path, but the one with less implications to our recommendations is path one. I think from the conversation we've had, I don't get a sense that anybody is going to be amenable to putting a ceiling value on in terms of recommendation 8.1. But perhaps there is a little bit of movement possible on the upper limit of the free allocatable variant labels.

Edmon has noted in chat that he thinks it might be better to align with ccTLDs rather than make arbitrary limits, or else it would be a point of divergence from a policy standpoint. You know, I guess that that is one way that we could address the ceiling value, because if I recall the ccNSO PDP, their recommendation basically says that they do have a ceiling value built in because of the meaningful representation requirement. So I guess that's one way we could align with that. So I've got Michael and then Justine, and I don't know who's giving the thumbs up. So, Michael and then Justine.

MICHAEL BAULAND:

Thanks, Michael, for the record. Two comments. First, regarding Edmon. Yeah, it's a bit problematic to align with the ccTLDs here because, as you said, the CCs do not actually have a ceiling value. In that sense, we are already aligned, and the meaning for representation is problematic because for the CCs, it's obvious that every TLD has a meaningful representation, or meaningful meaning, because it's representing the country. But for the gTLDs, you have TLDs that are abbreviations or whatever, or fantasy names, and so the context of meaningful is not really something we should go into from my point of view.

And the second comment is regarding your question, Donna. I think part one would be certainly a possibility, and one suggestion might be to lower the free allocatable variants to two because that would cover at least the Chinese ones. They can start with any label and then have the all traditional and all simplified versions as a variant, and it would also cover Latin because there is no real sense in making more variants. There are just two letters which

have allocatable variants, and the only real sensible way is to have similar to Chinese, to have the all ASCII label as a variant of those letters which are not ASCII. So, I think two might be a way forward if compromised. Thanks.

DONNA AUSTIN: Thanks very much, Michael. Justine?

JUSTINE CHEW: Thanks, this is Justine for the record. Number one, I completely agree with Michael in terms of his comments regarding aligning with ccTLD. I also see numerous weaknesses when it comes to comparing ccTLD and gTLDs. I don't think they can be comparable in all cases. In some cases, we're talking about oranges and apples. So, I think that may be a challenge that is possibly insurmountable by just aligning the policies.

Number two, which is what I really want to speak to, and Michael suggested a way forward. I don't know what the thoughts of the group here is to that. Obviously, it's something that we can consider. But as a side thing, and this is in one of the earlier slides as well, I wanted to broach whether there is appetite for us to go back, assuming that we don't change the recommendations to put in a ceiling or even to lower the package of four free to two free. I wonder if there's appetite for us to compromise on the other recommendations that deals with conservatism in the eyes of certain people, as they have explained it earlier, which is things like the question of need.

So, going back to implementation guidance 3.6, whether folks here would be amenable for us to look at tightening that, maybe possibly even promoting that into a recommendation rather than an implementation guidance. And in which case, then we have to think about how we might do that.

Also, in terms of evaluation from a technical and operational point of view, again, implementation guidance 3.8 and 3.9, possibility of tightening those up. And as you know, again, maybe to the extent that they become recommendations. So, I just wanted to gauge whether there's appetite to look at that aspect of things. Thanks.

DONNA AUSTIN:

Thanks, Justine. So, Justine's suggesting, and this is something that we heard from during the conversation earlier, is the need versus want and trying to strengthen the need requirement. So, Justine's recommendation to move 3.6 from implementation guidance to a recommendation and finding a way to strengthen that. I just want to see if there's any appetite for that. And I appreciate that folks need to go back to their groups on these questions, but just generally whether there's any support for making 3.6 a recommendation to change its status. So, Satish is okay with that. I guess, any objection? [inaudible] is okay with that. Okay. And Nigel is just noting that they have to go back and discuss on this. Dennis?

DENNIS TAN:

Thank you, Donna. Yeah, we'll take that back to the registries. But I just want to offer as well, it's not just going to be that question. I

envision that at some point because there's a technical questionnaire during the application process in which a registry operator must assert the technical capabilities. And, again, I envision there's going to be a section for IDNs and IDN variants and what are going to be the requirements and the test that those registry operators and, by extension, the selected back-end service provider will need to pass with flying colors those tests.

So that combination, the criteria, which is going to be a subjective answer, but we can think around how to, like a rubric in order to evaluate the answers. But there's going to be a more measurable set of tests, the technical aspects of it. And it depends how this group or the subsequent implementation review team will put those tests in place in order to assess the capabilities managing that. And, for example, the registrars allocating to the registrar and having tools and other artifacts in order to assess the main information on that domain. So I think it's going to be a combination of both. But, yeah.

Again, we'll take this input to the registered stakeholder group and come back. But, again, I just want to offer maybe let's think about expanding that or not expanding, but thinking in terms of what the applicant will need to answer, but also what the service providers will need to assert and be evaluated on. Thank you.

DONNA AUSTIN:

Right. Thanks, Dennis. And would have been helpful if we had an implementation review team already doing their work. I mean, some of you may be aware that there's a separate process that will be developed, which is around the capabilities of the of the

RSPs. And I would expect that in some way, the questions about if they're going to manage IDNs and variants that something will be built into that. And one of the ideas is that it's a pre-approval process so that the RSP is pre-evaluated as being able or capable to manage gTLDs and numbers of gTLDs, but I would expect, although I don't know for sure, that that will be expanded to include gTLDs and their variants.

The other thing I'd like to come back to because this is going to remind me of a negotiation I had with on a registry agreement recently, on the path one, so, Michael has bravely suggested lowering of the upper limit of free could be moved from four to two. And the rationale being that that would cover Chinese traditional and—the word escapes me. So two—would simplify. Thank you very much, Ariel. So I wonder if there's any other support for lowering the upper limit of the free allocatable variant labels.

Nigel saying not sure about going from four to two. Thought we had discussed that before. We had, Nigel, we did discuss that. But in light of the comments that we've received—so the idea of a public comment process is to give people the opportunity to provide their comments whether they support the recommendations or whether they have concerns. So the upper limit was something that was identified as is not being supported by some. So what we're trying to do is see if there's a way to change or modify the recommendation so that they're more amenable to most. And as Michael said, we're still waiting on input from the Arabic GPs regarding the—well, asking the question actually, and yes we are.

And just to pick up on a point that Sarmad made today but he certainly made it last week, he said it was never the expectation that, well, maybe at some point, it became understood that the root zone LGR panels weren't—What's the word? Some weren't responsive to putting ceilings on having allocatable and blocked variants or just having some have all blocked, but some of the panels didn't think it was in their purview to put limits on the number of variants. So the expectation was that perhaps policy in some other form could take care of that. And I guess that's what we're doing. So that's another balance I suppose. You know, while we haven't put a ceiling value, we have created I guess a cost barrier to anyone who wants more than four variants.

Okay, so not seeing any other even lukewarm support for the idea of lowering the upper limit of free allocatable variant labels. So I think what we'll explore is the need angle, Justine's suggestion of whether we can strengthen the need criteria. I think the other thing we might want to look at is the parallel with ccTLDs. So I appreciate that meaningful representation has a very specific meaning for ccTLDs. It probably might be prudent of us to find another form of words that is similar so that when somebody's applying for a gTLD and its variants, that there'd be some kind of connection with the primary and the variants. And that would come down to need and intended use, I suppose. So Justine?

JUSTINE CHEW:

Yes, this is Justine for the record. I know what I said earlier, but I'm thinking maybe if we were to develop the needs question a bit more, flesh it out a little bit more, then potentially meaningful representation could be one limb of that test amongst others. And

it can be as applicable, kind of take on that kind of stature.
Thanks.

DONNA AUSTIN:

Thanks Justine. Okay, so I think my sense of the conversation is, there's not a will to move away from our primary recommendations. That's 8.1, 3.11, 3.12 and 3.14. But I think there is the possibility that we could address this another way and that's through 3.6. You know, change it from implementation guidance to a recommendation and see if we can flesh it out a little bit more so that it's more meaningful. I think that's the sense of the path that I'm hearing. Does that sound reasonable to folks?

Okay. All right. And the meaningful representation question will—I think we have to find another form of words, but I think we understand that that meaningful representation for a ccTLD is quite specific, but I think we can draw parallels from that for what we're trying to do with IDNs.

Okay, so I'm looking at another chat and there's a conversation about whether we can end early today and there's two different camps on that. I appreciate that there is a council call that is happening in seven and a half hours' time. So, but anyway, let's see what Ariel has to say.

ARIEL LIANG:

Sorry, I wasn't commenting on that. I'm okay either way. But I just quickly want to remind folks about 3.6, that's in ICANN Org's comment. It did have a few questions to ask the group how to clarify that, that particular implementation guidance. And if we

elevate that into a recommendation, we probably still have to address it. So that's something we probably have to come back to those questions as a group. So a quick reminder of that one.

DONNA AUSTIN:

Okay, thanks Ariel. So we've got 30 minutes. We could continue through the public comment sheet that we had. But I'm happy—if folks want to leave now, raise your hand.

All right, everyone wants to stay. Let's push on, Ariel,

ARIEL LIANG:

Okay, sounds good. So, let me put the spreadsheet in the chat. So we ended at 3.22, that's about the challenge mechanism. Board may have some concerns, but we ended there, just a quick reminder of where we ended last time and then we're starting with implementation guidance 3.23.

So, I think just for in the interest of time, I may not go through the ones in detail, especially the ones that have zero comments but only support. So 3.23 falls in that category. So I'm just gonna skip this one. And I hope folks have no problem with.

And then 3.24. So, this is a recommendation in response to charter question A3, and that's also related to the recommendation regarding what if RZLGR was implemented incorrectly in the application system, how to deal with the consequence of that.

So, this recommendation says, applied for a gTLD string that has been accepted through the new gTLD submission system and correctly assessed by the DNS stability panel as invalid or blocked is disqualified, unless and until such a string is deemed valid and allocatable in a future version of the RZLGR, if any.

So it's basically kind of after the challenge mechanism that is still assessed the applied for string is invalid or blocked and then there's no issue with the RZLGR implementation then such string is disqualified. So, that's what this recommendation is getting at. And we received support as written from several parties and then ICANN Org provided some comment, I put this in a category of support intent with wording change. It just says, ICANN Org does not currently have plans for implementing a real-time monitoring mechanism to continuously assess all strings that are deemed invalid or blocked. Instead, such reviews would only take place during future application periods. The recommendation or its rationale may clarify this detail.

So, that's the comment and I'm not sure exactly what to change in terms of this one, but I think it just, ICANN Org give some kind of indication there will be no real-time monitoring mechanism for assessing invalid or blocked strings. But I will stop here and maybe Sarmad could shed some light on this, if you have any insights into what this is intended to do and whether any change is needed for the recommendation.

DONNA AUSTIN:

It seems like there is an impact on the recommendation that it can't be implemented. Maybe I've misunderstood. Sarmad.

SARMAD HUSSAIN: This is Sarmad. So, I'm actually not sure if I can respond completely, but I think this comment probably is suggesting that there may be some limitations in the tool. And so, if there is any expectation from the tools, which are available, they may actually, it may be useful to clarify it, I think, and that will help us develop it.

The other thing is that, even though it is, I think, possible to enumerate maybe allocatable variants, it is not easily possible to enumerate blocked variants because there may be too many. And I'm not sure whether that's related to this recommendation or not, but that is also one of the limitations which a tool like this may have. Thank you.

DONNA AUSTIN: Thanks. So, I guess I don't understand the process here. So if we have a recommendation that says it will be done, but ICANN is saying that the reviews could only take place during future application periods, does that mean for the immediate next round this won't be built, but it might be available beyond that? I mean, it seems to me that this recommendation is unworkable. So what do we do with that? Does it go to implementation and somebody says, well, we can't implement it? Ariel?

ARIEL LIANG: Yeah, this is Ariel, and I think I might understand what this is getting at because the first part of the recommendation seems straightforward. You know, if that string is indeed correctly assessed as invalid and blocked, then it's disqualified. So I don't

think this part has a problem. But I think the second part, unless and until such a string is deemed valid and allocatable in a future version of RZLGR, then such a string can be applied for.

So I think what the Org's comment is getting at is, is there expectation that this application will be kept in limbo and then there will be some kind of monitoring? And then when RZLGR update and something like this string is allocatable, valid string, then the application can just move forward? Is that what this recommendation is getting at?

But I don't think that's the intent of this recommendation. But I guess the part maybe will be helpful to clarify is that whether there is expectation that such applicant has to submit a new application for that string when the RZLGR update deems it as a valid and allocatable string, or whether the applicant doesn't have to submit a new application and then it will somehow just move forward once the RZLGR updates. So I think that's the part maybe it will be helpful to get some clarification from the group. And I see a couple of hands raised.

DENNIS TAN:

I guess that's my cue. First, Jennifer's question on the chat. Yeah, I don't think we want applications to be in limbo. And when I build on Ariel's comment, yeah, I think the recommendation just said it applies to the submission system. The submission system said it's invalid. But then there was an objection process, I believe, that that was the context that is implied here, where it is resolved by a DNS stability panel and the DNS stability panel unequivocally says, yeah, it's invalid or blocked or what have you, meaning you

cannot apply for it. And then that label is disqualified from the application round until such time, the root zone LGR changes, which it can be an event.

Yeah, I think my recollection is that we don't expect or anticipate that there's going to be an ongoing monetary system where all these applications that were at some point found invalid, they're going to be monitored and somehow a real time status—whether a new root zone LGR version is updated and then those labels now become valid. Right. I don't think that's our intention.

I think this recommendation comes from the question, should there be an objection process whereby an applicant has the right to object or appeal the mechanical calculation of the root zone LGR. That's what they are concerned about. But if it's the DNS stability find result that indeed the results, and those results are correct, then that application is really disqualified as any other application that does not meet the requirements or criteria. Thank you.

DONNA AUSTIN: Thanks, Dennis. Edmon.

EDMON CHUNG: Edmon speaking here personally. So I guess if I understand this background, this is two possibilities, right? There is one possibility where Dennis just mentioned, and that is the case where for whatever reasons the calculation is wrong and the applicant thinks that it shouldn't be calculated that way and they present a case and that's an appeals process.

Yes, but there is another situation whereby the applicant may be knowingly applying for example for a script that is not in the root zone LGR yet. Or applying for a string which is in the root zone LGR but they believe that an additional character should be there or certain characters should not be invalid.

And for those issues, I think when we first talked about it, we said, okay, they can wait until the root zone LGR is updated. Actually thinking about it again with this response from ICANN, maybe what is required also is that the applicant needs to state that they know this is invalid. And these are the steps that they're taking. They're either working to initiate and root zone LGR update by creating by working on a GP or redoing, reviewing a particular GP discussion or something. In that case, then ICANN Org doesn't have to quote unquote monitor situation. It's going to put on hold until such time that that either a new GP or the existing GP reviews and updates the root zone LGR. If I'm not mistaken, that's what this recommendation is about as well.

DONNA AUSTIN:

Thanks, Edmon. I do recall we had a conversation around that possibility. I've got to say that I'm pretty confused about this right now, in terms of the recommendation itself and what it means and also ICANN Org's comment. If I can just say that leadership will have a look at this and see if we can—I think we need to go back to the rationale and fully understand the recommendation and the context for how we got there. And that might shed some light on what the recommendation was supposed to mean and then I'm still really not sure about the applicability of ICANN Org's comments but we'll sort that out too.

Okay, so let's move on to the next one.

ARIEL LIANG:

Sounds good. And moving on to a 4.1. So that's one of our cornerstone recommendations. It's the string similarity review hybrid model. The good news is that we don't have any opposition or concern actually. Half of the commenters that commented they support as written. But ICANN Org's case, I categorized this as support recommendation intent with wording change. So I'm just going to go through the comments here.

So the first comment is, it's definitely not a substantive comment, is recommend the group to provide a numbered list for the bullet points in recommendation 4.1, it will help minimize confusion and enhance clarity when making references to the specific elements of the recommendation text. So just change these bullet points into numbered list. I think it's easy to do definitely and make sense.

Second suggestion is to revise the phrase, all of their allocatable and blocked variant labels mentioned in bullet point five and clarify that it pertains specifically to string similarity. And this revision aims to align with the recommendations 3.18 which emphasizes that the reserved names list should not be expanded to incorporate variant labels. So it's basically it's all strings of on the reserved names list and all of their allocatable and block variant labels. So, basically just state this is the only occasion that their variant labels will be taken into consideration. It's in the string similarity review context, but there's no such intent to expand the actual list to include these variant labels because our

recommendations, 3.18 that's the case. So that's the second comment. And I also think it's not a very difficult change to make it clearer.

And then here comes the third comment. I think it may generate some discussion here. So it says, ICANN Org acknowledges the possibility of a scenario where the string similarity review panel identifies certain strings that are more than two characters to be confusingly similar to a ccTLD. However, the current phrasing of this recommendation restricts the comparisons exclusively to two character strings. This limitation may lead to confusability issues with ccTLDs and potentially have a negative impact on the ccTLD community. There's a further observation that in other instances of string comparisons, there is no requirement to consider the similarity of string lengths prior to assessing string similarity.

So this comment is pertaining to the last bullet point in the first paragraph, it says the applied for string and their allocatable variant labels must be compared against any other two character ASCII strings and all of their variant labels if the apply for string is a two character string.

So basically Org's comment is asking whether this part in the bracket is a bit limiting and only limit to two character string. And I guess just as a reminder why this part was included here, is because that was in the 2012 round AGB. It specifically refers to applied for string that is has two characters and this particular comparison applies and then that was affirmed by SubPro PDP and that's why we carried the wording over here.

But I guess ICANN Org is asking whether keeping this here would be limiting, because the hybrid model is already kind of going beyond the basic model of a string similarity review. It's already enhancing it by including variant labels in the consideration. So It may not be a terrible thing to remove this bracket, this condition, but this is something the group may want to discuss. So that's the third comment from Org. I will stop here.

DONNA AUSTIN:

Any thoughts on this from folks just to the initial level? I mean, there is a comparison with existing ccTLDs and all of their allocatable and blocked variant labels. So how is the last point different to that? So doesn't—the fact that there'd be a comparison with ccTLDs mean that you don't really have to change. The last one. I guess the other question is, do we lose anything if we just get what Ariel suggested and just get rid of the language that's in brackets? Sarmad?

SARMAD HUSSAIN:

Yeah, the question is that what if string similarity review panel finds a single character or three character string confusable with a two letter ASCII ccTLD. Should that then be Just ignored? I guess I'm saying that this may or may not happen. But if it does happen, what would be next steps? It should then—just the current recommendation suggests that it could just still proceed.

DONNA AUSTIN:

Dennis.

DENNIS TAN: Thank you. Just building on Sarmad's question and use case. I don't think—and Donna, Justine and others, keep me honest here, but I don't think we—Our recommendations really focus on the basis for comparisons. We are not in any way, shape or form, direction the outcomes. Or how does the string similarity panel reaches to the outcomes. We are considering once the outcome is rendered, right? Whether it's found similar or not similar, there are certain recommendations we're doing, but we are not saying how they reach to those conclusions. So I'm not sure whether we need to change anything here. What we're saying, this is your basis for comparison, which includes the two characters. But the example that Sarmad just explained, a single character that is found confusingly similar, that's, I guess that's possible. And if the panel decides, yes, those are confusingly similar, then something is going to happen. And I don't think we as a group, we are saying this ought to happen, this ought happen. We're saying, look at these labels, you know, decide however you want to decide confusing similarity is, and then, you know, proceed from there. Or maybe my recollection is off, but I think that was the kind of the basis of our recommendation, defining the basis for comparison and suggesting outcomes once those decisions are made, but how the panel reaches those conclusions, that's outside our recommendation.

DONNA AUSTIN: Thanks, Dennis. Sarmad.

SARMAD HUSSAIN: Right, I think this is raising something which is slightly different. I guess the question this is raising is not what the process is, but what is the scope of the comparison in these last items? Basically, string similarity review panel, it is being suggested that even if there is a similarity, such that, for example, a single character is confusable with the ASCII two-letter string, even if they determine it through whatever process, that is not admissible case in string similarity. Thank you.

DONNA AUSTIN: Thanks. So we're just about at time. So, I guess we'll do a little bit of investigation and see if we can unpack this a little bit and come back with a recommendation to the group as to how to deal with this one.

Okay. All right. With that, I think we'll call it a day. And Jennifer's saying she doesn't—I don't think we lose the meaning of our recommendations if we remove the language in the brackets. So we'll, yeah, we'll double check that.

Okay. All right. We will call it a day and I guess we'll see you all here next week. Thanks everybody. And I really appreciate your discussion earlier in the call. I think it was a good discussion, wide ranging one, and I'm pleased that we've, we landed somewhere. Okay. Thanks everybody. We'll see you next week.

[END OF TRANSCRIPTION]