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**ICANN Transcription**

**IDNs EPDP F2F Workshop PM Session**

**Thursday, 07 December 2023 at 06:00 UTC**

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DAN GLUCK:

Hello, everyone, and welcome back to the IDNs face-to-face. This is session three of day two of our meetings. Same things as before. The important thing is we maintain the ICANN's expected standards of behavior. And with that, I'll hand it off to Donna.

DONNA AUSTIN:

All right. Thanks, everybody, and welcome back. I hope you have a nice lunch, and it's not going to send you to sleep. So I just want to recognize that we have a new person with us. John down there on the left-hand side. John is the NPOC communications chair, and you're based in KL, so you're interested to pop in and see what we were doing. So welcome, John. And yeah, I guess that's it. Anything you wanted to say, John? Okay. All right.

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[JOHN:]

Thanks for having me, though.

DONNA AUSTIN:

Thank you for your interest. So I think on question G1, I think we're pretty much on the same page. There might be some detail we need to fill out. But I think where we're leaning is that the vehicle that's currently in place is probably the most appropriate one to continue with the development of IDN implementation guidelines. There may be some sensitivities around the word guidelines. So we may want to recommend that there'd be some change to that. But the vehicle to update them is appropriate. But we think it would benefit from some kind of governance and documented processes, the transparency. But also I think if we have a recommendation that supports the IDN working group as the guideline and that gives credence to that body to continue the work that it's doing. So I think some of the suggestions that we've had is that perhaps a charter, define the scope. I think some of the concern with 4.4 or 4.1 is some of the recommendations were creeping into policy consensus policy rather than technical. So the intent of the IDN working group would be narrowly focused on the technical implementation that's whether it's coming out of the IETF or there's another trigger that needs the IDN working group to look at the work or look at the issue. I think about the representation, I think the community wide call for expressions of interest is probably still appropriate with the expectation that whoever signs up must have technical expertise. So it will be a tailored, I guess, call for expressions of interest in that you will have to identify what your technical expertise is. So I think we're on the same page that the current vehicle is the one that should continue, but it does

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need some enhancements. And I think Ariel identified that there's some things in the GNSO PDP process that perhaps could be copied or modified, adapted in some way. But I think that the vehicle that we have at the moment is the one that continue to continue. And also to note that we did give some consideration to the PDPs, the possible path, but we recognize that the work that this group does crosses ccTLDs and gTLDs. And the intent is to have consistency across those TLDs so that the underlying issue is security and stability. So if they're working in the same direction, then that we run into the risk. If we do a PDP, then that is only for contracted parties and won't cover ccTLDs. So if we keep this vehicle, which is actually working for both at the moment with some recommended enhancements, then I think that's the way we want to go. So any additions to that? Anything I missed? Okay. So I think we can move to G1A.

ARIEL LIANG:

Thanks, Donna. This is Ariel. So G1A is a kind of strange question, to be honest, because I think the intent of G1A is to ask, if the implementation guideline is no longer the appropriate vehicle, then what other document or mechanism should replace it? Because there needs to be some kind of contractual legal mechanism, at least for the gTLDs, and then maybe some ccTLDs also want to follow that. So what would be the alternative or separate legal mechanism? I think that's what this question is asking. So based on the discussion we already had, and I think based on G1, that we're not getting rid of implementation guidelines, but improving the process and the mechanism, do you believe this question is moot? Or do you think there are some

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gaps we should address here? And also the two discussion questions we have on the screen, it may not be really needed to be discussed at this point, may not be necessary or fit for purpose. So I just wonder from the group, what's your take on this one? And do you think it's moot question at this stage?

DONNA AUSTIN: Kind of seems like it's moot to me, given where we ended up on the first question. I'm seeing people nodding. Satish, go ahead.

SATISH BABU: Yeah, so we have not done a thorough analysis of the deferred items from the 4.0. Now, if all the items deferred are part of our scope, then there's no gap. But if there's anything that isn't left out of our scope, it has been deferred, then that becomes a potential outstanding issue. And then we have to think about it. But I haven't really kind of studied these deferred items in detail. Thanks.

DONNA AUSTIN: So perhaps we have a defer this until we look at the recommendations from the guidelines that were deferred and that are now part of our work. Okay. Edmon, go ahead.

EDMON CHUNG: Can you perhaps I don't know if Sarmad has readily—because Sarmad is probably most familiar with those deferred ones. Have we covered it with this charter?

DONNA AUSTIN: Still to come. So let's come back to this one after we've been through the charter questions.

SETVE CHAN: I was just sitting here musing about the ideas that were suggested to improve the process for developing the IDN implementation guidelines, and just asking how do we actually get as a group to agreed upon set of improvements that perhaps this group wants to suggest. And so I was just trying to confer with Ariel here but it's probably a good question for everyone. Like what's is it best to just take this as future work that this group needs to do or is it worth maybe pursuing it further here or just sort of an open question. Thanks.

DONNA AUSTIN: So my thinking on that is that we had some good discussion and some suggestions came out of that in the earlier session. So when we go back to the notes and we pull those out and we develop the text and then we can work on it. So I think we've had some good suggestions so we can pull those out when we develop the text and then we'll come back and have a second conversation. So that's where I was leaning to. Manju.

MANJU CHEN: I was not sure if I should have jumped in but I was thinking regarding improvement now that we're at this topic. Probably we can also kind of add things—Because I think reflecting our

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discussions during the council SPS, the problem with the CCWG is there's no existing procedure whatsoever. Nothing written in bylaw or any kind of operating principle. So it's like when the recommendations delivered and whoever is accepting the recommendation decided later that they feel like the recommendation should be revised or they wanted to non-adopt the original adopted recommendation, there's no existing mechanism whatsoever to follow to kind of revise the recommendation or to send it back to a body that should be in charge of revising the recommendation according to those who want the recommendation to be revised. And for PDP of course there's a procedure which is section 16. I don't remember but there are existing procedure. So just in case I guess to be future proof in a sense, probably this mechanism, whatever we're suggesting should have this kind of mechanisms in place too and that's probably improvement we should be considering. Also I was thinking for example when there's a PDP, GNSO Council is the manager of this PDP and I don't know who's going to be the manager of this mechanism because I guess we were discussing that all board can initiate a review. GNSO Council can initiate a review or ccNSO Council can initiate this review. So is it like whoever initiated is going to be the manager? But then does it defy the concept that we want it to be a non-PDP? So probably we should take that into consideration when we're talking about improvement too. Thank you.

DONNA AUSTIN:

Thanks Manju. So I think there's a couple of things that I'm still not sure about with this, and that's whether we have a pretty broad

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recommendation and then the detail is worked out with some high level suggestions and then the detail is worked out during implementation or whether we get really specific about what we think should happen. So that's what I'm not sure about at the moment. And I guess my preference is that we've still got a bit of work to get through in our face to face, but I really think this is a chunk of work that we can think about and come back to and go through during a call and I think what you've raised is a good one and we can hash some of that stuff out on a call. But I'm a little bit surprised we got to the place that we're in reasonably quickly so I don't know that we need to belabor that. But your point's a good one. So it's a question of how prescriptive do we want to be in designing or enhancing whatever the current process is—Well, no. So this being a PDP, it would be the IRT that would get into the implementation detail and of course there's a risk with that. If we want to be a little bit more hands on in the design, then we should be prescriptive in the implementation guidance, I suppose. So yeah, good question. My hope was that we'd just continue on and get through the rest of our questions and maybe tomorrow. If there's a chance to come back to this, we could, but happy to take other suggestions from folks. So I've got Jennifer, Edmon and Nigel.

JENNIFER CHUNG:

yes, I absolutely want to highlight Manju's point. I think I talked about it slightly in slightly different terms before the lunch break, but for the registries and the contract parties, the predictability of how implementation happens is extremely important and I think Sarmad gave us a very good rundown of how it was implemented

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previously. I think what we can do as a group is to see if we can kind of draw from that and codify that in some more high level framework instead of being really picky with the details. I think that would be useful. I do take Manju's point because the not predictability of what is expected behavior from the board, from the implementation, from IRT, from everything is definitely not desirable for anybody involved. Thanks.

DONNA AUSTIN: Thanks Jennifer. Edmon and Nigel.

EDMON CHUNG: Edmon, speaking personally. This I think refers to the trigger question, how reviews can be triggered. I think the point especially about whether GNSO or ccNSO can trigger. I think the short answer should be yes, but how is the prescriptive part, probably will need to be implemented later. I want to highlight also that it's probably better to stay at a slightly higher level especially because it includes the ccNSO as well. I would anticipate if this goes eventually to the board, the board will engage with the ccNSO for this particular part of the implementation. But implementation guidance would be quite useful at least for the GNSO side. What we like to see as a base would be highly useful because I don't think the ccNSO is actively talking about this so it would be useful to have the input already from the GNSO, what it looks like as a minimum. And then that could be taken further.

DONNA AUSTIN: Thanks Edmon. Nigel.



**NIGEL HICKSON:** Yes, thank you. Good afternoon. I think I agree that we have the opportunity here given that we are a policy development process to actually, if you like, make some progress or suggest some refinements, some improvements to the IDN guidance working group to the way its output is implemented or the structure or whatever. And I think it's a one-off opportunity. And whether we perhaps consult with the ccNSO in some way going forward, that would be useful. I know we've only got so long to do things, but it does strike me as if this is an opportunity. And two factors that we touched on before. One, the membership of this perhaps needs to be widened to other experts in the community and the trigger. I mean, yeah, I mean, triggered by GNSO or the ccNSO, they're the main parties, but perhaps there needs to be a default mechanism in that if nothing has happened in five years, then at least, then there's at least some sort of review of whether there needs to be some changes. Thanks.

**DONNA AUSTIN:** Thanks, Nigel. And the other thing that I was kind of thinking about is that this wouldn't be, if we could put down the GNSO structure, that would be useful or even the ccNSO, but I don't think that's the appropriate kind of governance place for that to be. But thinking about the Customer Standing Committee, I think that's actually codified in the bylaws. So it's what level of recognition do we want to give to this group? What's the importance? I think I'd want a bit more information about what that would actually mean, but I wonder whether it rises to that level. It probably doesn't, but maybe that's something else that we might want to explore. So

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Steve, does that answer your question? Yep. Okay. All right. So, and I think the other thing is that we need an opportunity for folks to go back to their respective groups and have conversations about this and then come back to us. So we'll see how we go. If we have time tomorrow, maybe we can come back to this and do a bit more brainstorming. But for now, I think we'll leave it with, we'll go through the notes and Edmon suggested in chat that maybe leadership and staff could develop some kind of straw man so we could look at that as well and bring that back to the group. Okay. So we'll move on to our next charter question.

ARIEL LIANG:

Good news is we are done with charter questions. Now we are looking at some potential gaps. Well, we do have a G1A parked, but we'll go back to that. But this section of the agenda is to look at the deferred items from implementation guideline 4.0. And if you recall, there are five items or five guidelines. So we're gonna go through each one of them and look at what the EPDP team's conclusion is. And then we can discuss as a group, whether you think these guidelines have been addressed. And if not, do you believe we need to do something about the gaps? So that's the purpose of going through this.

So the first one is a guideline 6A. On the left hand side, that's what is written in the version 4.0. And on the right hand side is the corresponding charter question. And the mapping was done by the GNSO council when we had this back and forth conversation with the board. And the board actually also agreed with that mapping, I believe. So that's the structure how we're gonna go through this.

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I just read the guideline version 4.0, 6A. It says IDN tables must be placed in the IANA repository for IDN practices. Further, A, except as applicable in 6B below, registries must use RFC 7940 label generation rule sets using XML format to represent an IDN table. So I think the part that really, I guess, triggered the registries when this guideline was issued is with regard to the IDN table format. And there's a mandatory kind of requirement using the XML format in RFC 7940. So if you look at the corresponding charter question of EPDP, that's charter question C6. So we talked about this quite a bit. And it's about the IDN table format. And the same RFC was mentioned. So that's the mapping here.

And just to refresh everybody, what we concluded is the group decided not to issue a recommendation. And at the same time, the group decided to provide a response to the charter question is to not recommend any specific IDN table format because that's to the discretion of registry operators. And also, we reviewed the kind of current situation with regard to the IDN table format. There are many different types. And the majority of them are not the XML format. So it would take a lot of effort to convert that. And also, it's an output. It's not really something to basically to comply with ICANN requirement. But in the back end, it's something different. It's not like you develop an IDN table and that's it. So based on this background, the group decided not to recommend anything specifically with regard to IDN table format and then develop a response to this charter question by capturing the rationale. So that's that item. It's the first item, guideline 6A. So just want to quickly pause and see whether there's any comment from the group. And then just based on what we discussed, it

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seems there is no gap that needs to be filled. And this item is addressed.

DONNA AUSTIN: So I guess the question I have here is how do we reflect this? So Is it a GNSO council ask? Because this is a deferred from the guidelines. I'm not sure what the ask is here. Do we just simply say that this was addressed in the EPDP IDN charter question C6 and that's the recommendation that stands? Maxim.

MAXIM ALZOBA: Speaking about this machine readable format, since IDN tables are just a representation of the data processing in the platforms of registry and registrar and not a [source item,] the requirement for all registries to basically redo all the IANA tables for some unknown... Yeah, for some reason. It affects registries. It adds some working time for coders and money to be spent on this process, but gives nothing in return. So I believe it was the main reason why registries didn't like it. Thanks.

DONNA AUSTIN: Thanks, Maxim. Anyone else? Michael?

MICHAEL BAULAND: Yes, Michael, for the record. Could a compromise maybe be some grandfathering process that all existing TLDs with existing IDN tables may keep their IDN tables and just new TLDs and new IDN tables would have to use the LGR format?

DONNA AUSTIN: I guess that's a question I have here. Because the IDN guideline is something that we've discussed in the PDP and we have a recommendation that is not consistent with the guideline, then what's our action here? I'm a little bit fuzzy on what I ask is here, but I think because we have a recommendation that's coming through our PDP, that recommendation is going to override the guidelines, but I'm not sure how we reflect that. So I've just got a procedural process thing going around in my head that I don't understand. Sarmad and Edmon.

SARMAD HUSSAIN: Thank you. So probably not going to go into the discussion about the technical details of the particular guideline, but trying to maybe respond to your question, Donna. So there was a letter which was sent to the board from the GNSO council asking the board to consider deferring some of the guidelines while GNSO considers them as part of the IDN and PDP process. So to close the loop, I think one way would be to once this EPDP's addressed those particular guidelines would be for GNSO to maybe go back to the board and say that we've now gone through the process and for these guidelines, these are considered, addressed, accepted or not, but addressed through that process, and therefore these might be—these are whatever the decisions were integrated into the policy, and so they may be taken out of the IDN guidelines, or if this working group and eventually GNSO feels that something needs to be put back into the guidelines, whatever, but I think there needs to be that communication back to the board, and

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based on that process, the board can close it on their end. Maybe that's one way of closing it. Thank you.

DONNA AUSTIN: Thanks, Sarmad. Edmon?

EDMON CHUNG: Edmon here. So I would think that one potential scenario—Of course what Sarmad said is one potential way, but if out of these few items, there are a number of them that needs to be reworked on, then precisely the recommendations here of creating that process will kick in, right? I mean, once it's implemented, then whether it's the GNSO or the board can initiate that process and seat that working group, and that working group should work through it and, yeah, and create its recommendations, which will go back to the councils and go back to the board to address it. I mean, it seems like a very long drawn out, but I guess that is the logical extension of how we are at least looking at making the recommendations.

DONNA AUSTIN: Okay, thanks, Edmon. Satish?

SATISH BABU: Just a clarification question, Satish, for the record. When you said deferred, is it a permanent deferment or is it a temporary kind of a thing?

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DONNA AUSTIN: I think it was a deferment pending consideration by the EPDP. Is that accurate? Yeah.

SATISH BABU: So we have the authority to kind of take it out of the IDN implementation guidelines charter?

DONNA AUSTIN: Out of the guidelines, do you mean? Yeah. So I think it's really a process question. So if, and similar to what Sarmad's saying, that the council goes back to the board and says these things have now been considered by the EPDP, this is the outcome. And I guess ultimately it's for the board to decide what they'll do with it. So whether it comes out of the guidelines because of the EPDP consideration or whether the board decides to override the EPDP recommendation, which they can do for any of our recommendations, really. Yeah. Edmon?

EDMON CHUNG: Yeah. And because 4.1 already took out these ones, so 4.1 will continue to be in effect.

DONNA AUSTIN: Okay.

ARIEL LIANG: Thanks, everybody for the discussion. Moving on to the next one is guideline 11. It says IDN variant labels generated by an IDN

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table must be either A, allocatable only to the same registrant as the primary IDN label or blocked from registration. So basically what we mapped is mapped to charter question C1 and C2. The text is a bit long, so I'm just going to summarize it. It's basically the same entity principle related charter questions and same entity at the second level in particular. So basically variant domains, they are activated for the same registrant were withheld. Although we didn't specifically set blocked, but it's part of it. Nobody else can register.

So it's basically the mapping, and we have several recommendations to reflect the same entity principle. So first one is the recommendation two. Basically it's what I said earlier about the same entity principle applies to the activation of future variant domain names. Although we still need to work on the terminology here, activation versus allocation, but the gist is same entity principle. And then also recommendation number three, that's with regard to, I believe the grandfathered domain names. So basically it says immediately prior to the policy effective date of the same entity principle, the existing variant domain names that do not conform to the same entity principle must be grandfathered. It means there will be no change to the contractual or activation status of those existing variant domain names. So we provided some caveat or exceptions for the ones that already exist, but do not comply with the same entity principle. We're not forcing that requirement retroactively to those domain names.

And then also recommendation four, any allocatable variant domain names of grandfathered domain names cannot be activated unless and until only one registrant and one sponsoring



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registrar remain for the grandfathered domain names from the relevant variant domain set. So it still talks about the grandfathered ones, but there's a specific condition is they're allowed to continue to exist the way they were, but no more activation of the variant names from that set. So this is to basically kind of explain what same entity principle mean at the second level through these recommendations. And I believe it addressed the guideline 11 and basically agreed with it. So, for example, this type of guideline could potentially move forward because it doesn't contradict with the EPDP's outcome if the GNSO council also agree with it and adopt it. And I'll pause here for a moment, see whether there's any comments or questions.

DONNA AUSTIN: Jennifer?

JENNIFER CHUNG: Thanks, Donna. Jennifer for the record. This is another procedural question. So as we go through all of this, there could be ones that we differ from the IDN, the 4.0 guidelines and we have our own, we're saying that supersedes, but at the end of the day, does that kind of wrap into what this group produces? Or if we do also in essence, if we kind of reaffirm the IDN 4.0 guideline, does that language get put in saying we're going to do this or does our language supersede? I'm not saying it very well, but.

DONNA AUSTIN: Yeah, and that's what I was struggling with. I don't know. Yeah. Sarmad may have some thoughts. Sarmad?

SARMAD HUSSAIN: So I think both work. It's up to this group to decide whether what they would want to recommend back on whether to keep that guideline as is or to reword it potentially or to just take it out. I think if you suggest some clear path forward, that can be obviously considered by the board. Thank you.

DONNA AUSTIN: Thanks, Sarmad. So I guess what we could do is for this one, because it's similar to the same entity principle, we could have a recommendation and it's not a policy recommendation, but it's a recommendation that the IDN guideline be updated to remove number 11, because we've got it covered in recommendation, whatever. Sarmad?

SARMAD HUSSAIN: Just to add that these also apply to ccTLDs. So if you take out something that assumes that it is also covered on that site. Thank you.

EDMON CHUNG: As I was saying earlier, then I don't think the board will be in a position to reword the implementation guidelines. And currently for 4.1, they are taken out. I mean, at least they're conceptually taken out because they're not adopted. I don't know whether 4.1 actually takes it out or just marks it. I forgot whether I forgot which one we taken out completely or it was just marked that it's not included.

SETVE CHAN: It's there, it's grayed out and marked as deferred.

EDMON CHUNG: All right. So in my view, what's going to happen, at least the board certainly is not going to sit down and try to reword it, first of all. And if it's taken out, it's currently conceptually taken out already. So if it is going to be reworded, then a new process needs to be in place. So the recommendations from here and towards the implementation is going to lead towards that. If the GNSO policies already superseded it in the implementation example for the new gTLDs or for existing ones, then they would have already superseded it. And we will not have replacement stuff for the ccNSO. So at that particular point, then again, the board will, board or ccNSO or GNSO will have to decide whether or not to trigger a process to fill it back in so that it's consistent across CCs and Gs. But perhaps these are exactly, some of these might actually be things that have to diverge between the G and CC.

ARIEL LIANG: So if my recollection is correct, I think ccPDP4, they explicitly stated they are not going to touch on second level related recommendations or it's just outside their limit. So even in the ccPDP 4 initial report, it didn't really have any second level topic and they said they're not going to talk about those. So I wonder if they already said that, would the implementation guideline have any effect for ccNSO or I just wonder if they express explicitly state that in their policy work.

DONNA AUSTIN: Hadia and then Sarmad.

HADIA ELMINIAWI: Thank you. This is Hadia. I was wondering that maybe we could complement our recommendation C1 and C2 with another recommendation that says that the IDN implementation guideline V4.0 number 11 should take into consideration our C1 and C2 during implementation. And by that, we actually do not take any implementation guidelines out of the V4 policy, but add another recommendation that for them to follow actually our produced recommendations or take into consideration our produced recommendations. And we need to remember that actually the implementation guideline number 11 was actually deferred because they were waiting for our output. So it does make sense at the end of the day that they take our output in that regard. Thank you.

DONNA AUSTIN: So notwithstanding that we need to reach some agreement on the consequence of what we're doing here, can we just continue through Ariel's mapping exercise and at least see if we agree and then we can worry about the procedural stuff later? Because I think there's probably a number of different ways that it could be done, but all of them seem problematic to me at the moment. So Ariel.

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ARIEL LIANG:

Thanks, everybody. So moving on to the next one, which is guideline 12. So I will read the full text here, but I just want to note I highlighted the portion that based on my own reading, this might be a gap, but up to the group to discuss and decide whether this is something worth addressing. It says TLD registries may activate an IDN variant label provided that one such IDN variant label is requested by the same registrant or corresponding registrar as the primary IDN label. Two, such IDN variant label is registered to the registrant of the primary IDN label. And three, such IDN variant label conforms with the registry policy and IDN tables. So the first paragraph is basically same entity principles still and activation of variant domains for the same entity.

The second paragraph, in exceptional cases, one, to support a widely acceptable practice within internet users of a language or script community, or two, to abide by language or script established conventions, a TLD registry may opt to activate a limited number of IDN variant labels at its discretion according to its policies. In such cases, the TLD registry must have mechanism to limit automatic activation of IDN variant labels to a minimum.

So the second paragraph I feel in general, we haven't really talked about it during our deliberation of the activation of variant domains. It seems to suggest that the registry should put some kind of a ceiling or kind of a break in terms of activation of variant domain names or labels at the second level and potentially, I guess, is to address the potential permutation issue that we discussed before. And there's also notes, I think it's a kind of annex of the implementation guidelines version 4.0. It says automatic activation may be considered acceptable practice for

Chinese language. I think that was touched by [inaudible] maybe in the passing. So the part I highlighted here is about automatic activation. And I just wonder whether the group has any thought about this and do you think this is a policy question that should be addressed or it's down to the implementation detail and it's up to the registries to decide on that.

And the other point, the reason why I brought this up is the language in the guideline says must have mechanism. You know, so I wonder whether that seems strong and that's why we need to talk about it. And Sarmad, please.

SARMAD HUSSAIN:

Just to add a bit more detail and context to this. So at ICANN, we've actually sometimes received requests that certain variants should be automatically activated. For example, if somebody applies for simplified Chinese label, the traditional Chinese label should be automatically activated even without the registrant's request. Since we didn't actually have any, I guess, direction on it from an implementation perspective, we've not acted on such requests and said that the label can only be activated on the explicit request of the registrant, obviously through the registrar. But there again, in cases where a whole script community, for example, Chinese community makes a decision that the registrations may be done in a certain way, this guideline allows for that provision. It still requires, for example, that the Chinese community make that decision. But it allows for that provision. That's not discussed by IDN, EPDP, of course.

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So basically, that's sort of the missing piece. And number 12, basically is saying that activation or any variants will be activated on the request of registrars. That's the first part. But I think that's not the main part of the recommendation. The reason this recommendation was put in was basically to cater to that second part, where it allows for potential activation automatically, if the community for that script generally agrees. So that's sort of the context of this. Thank you. Sorry, just one more point. So then if this is not addressed, I guess, so we would probably need some feedback from the group on how to address this because GNSO suggested that this really should be now taken up by EPDP. And so as Ariel's highlighted, there's some pieces of it, which are not clearly addressed. So at some point when you respond back on this guideline, you probably need to address this working group would need to address all the pieces of this recommendation on how to proceed on them. Thank you.

DONNA AUSTIN: We got Edmon, Satish and Michael.

EDMON CHUNG: I guess I'm speaking more of a part of the group that developed the implementation guidelines and given a little bit more of a background to this. So this particular guideline, if I remember correctly in the discussions, was kind of necessary because one of the staff papers recommended that all variants must be activated explicitly by the registrant or through the registrar. Whereas in practice, especially for the Chinese, a lot of times the simplified Chinese or the full traditional Chinese is automatically

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activated for the registrant. So there was a discrepancy there. So in my view, based on that, if the policy has taken this as part of consideration and decidedly not to say anything about it which is basically to allow registries to implement it in a way, that would be sufficient enough. And I mean, silence would already make the recommendation—Because—And the reason why this was included was because of the staff paper that made that recommendation and the implementation guidelines team felt that it was needed to address this issue so that the practice of the auto activation could be accepted.

SATISH BABU:

Satish for the record. So as it is stated here, this is too kind of sweeping. I mean, I'm talking about the implementation guideline because it can the numbers, it goes against the principle of conservatism. This EPDP team has discussed this point in detail and we have come out of the recommendation, I think that should override this recommendation. I don't see any gap here really because it clearly overrides what is stated here. And this to me is a, I mean, it is a risky kind of a strategy because as pointed out in chat, there are script communities where the number of variants is very large. Thanks.

DONNA AUSTIN:

Thanks Satish. Michael.

MICHAEL BAULAND:

Yes, Michael for the record. I would also agree that the decision whether automatic variants are supported and if so, how many or



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what the limit should be, this should all be left to the registry to decide. Yes, it's true that there may be a whole lot of variants that could be activated, but then again, the DNS for this is also run by the registry. So as Edmon said, they should think about what they are doing, but if they say it's sensible, for example, if we say, oh, it must be at most 10, but the registry has some use case or whatever reasoning that they think 15 or 20 is the number they would want to go with and they say their DNS is capable of doing this, I don't see that we should restrict them in the way they want to do their business.

DONNA AUSTIN: Thanks Michael. Sarmad and then Nitin.

SARMAD HUSSAIN: Thank you. So there's SSAC advice on this as we've already discussed in the context of top level domains that variants activated should be minimized for preventing management issues with the registrants, registrars and registries. And they explicitly talk about permutation issues caused by variants at the second level across the variants at the top level. So if there's no explicit guidance available, then the default would be to minimize variants, which would be, for example, not allowing for automatic activation and leaving it to the registrant to actually decide what levels they want. So I would request that if that position needs to be overridden, then this working group really should say something about it. That gives us something to then work on. Otherwise, of course, this SSAC advisory obviously is already there. And if it does, then considering that SSAC advice, that is the part which is

highlighted as well that if automatic activation is done, then there needs to be some mechanism to manage the total number of variant domain names as to what is needed rather than what is probably wanted. And that mechanism, of course, needs to be developed as well. Again, the motivation of balancing this comes from SSAC advice. And just because of conservatism, I think the default would perhaps be not active allowing automatic activation, being conservative, unless there's an explicit either guideline or policy recommendation, which is passed on to the ICANN. Thank you.

DONNA AUSTIN:

So, Sarmad, to what extent was the SSAC advice part of the discussion around this? Do you remember the development of this? Because it does seem to me that it's limited to a minimum. And it must have a mechanism in place to limit automatic activation to a minimum.

SARMAD HUSSAIN:

Right. And I think that's, for example, the overall guideline and idea was that if Chinese community would want automatic activation, they would discuss it at a Chinese community level and come up with some clear recommendation on what is that minimum activation they would want. So it's not something which is sort of, I guess, automatically allowed through this, unless there is actually a community discussion and decision on it. And we obviously would get guidance from the community on it. But before even that is possible, there needs to be a mechanism, some mechanism in place to allow for automatic activation by the

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registry without the registrar, registrant requesting for it. Thank you.

NITIN WALIA:

Actually, in this particular guideline, the limit will always be a challenge, actually, because this cannot be universal. Based on the script, based on the registry for like the example, which has been given for the Arabic, where the numbers could be as many as endless actually. There could be a script where there would be only a handful number of blocking would be required or registration would be required. So whatever the limit which would be automatically be put upon cannot be universal in this particular case. So I think in this particular guideline, any minimum limit which would be set cannot be universal.

MICHAEL BAULAND:

Exactly, that cannot be a universal limit. But could we maybe say or make a policy that states that if a registry wants to have automatic variant activation, they have to set a limit, but we don't enforce which limit this is? We just say they, whenever they sign the contract or wherever they put that information, they have to come up with any number and thereby we have a restriction on the automatic variant activation, but we don't interfere with the business model of the registry.

SARMAD HUSSAIN:

I think just to follow up on Nitin, I think the intention was not to create like a universal limit, but leave it to different communities to decide what would be a reasonable limit in such cases for a

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particular script. So Chinese script community may decide a particular number based on their script and another script may also decide something different, but it is something which needs to be discussed by that script community and make a recommendation. I think that was sort of the intention. Thank you.

DONNA AUSTIN:

I need some help because I'm really at a loss as to what we can do here. It seems that if this is a missing piece in what we've discussed, then do we want to have a policy recommendation that is consistent with this, but gives the discretion to the registry operator to decide what the limit is and whether it has automatic activation. And I'm sorry, I'm just really struggling with what the ask is here. Or what our job is here. So any help?

EDMON CHUNG:

Edmon, speaking personally here. So to that, if the group thinks it's useful to add, then maybe based on some of the relevant recommendations already, we could either add a implementation guideline as in to state that registry, because it's already consistent with what I think previous parts have said. So registries have their discretion to implement the policies. However, they should take into consideration the SSAC guidance in terms of the minimize part.

I think somehow it is already included, whether may not be in one succinct sentence, but these elements can be pulled together in one additional sentence in particular recommendation or as part of

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the implementation guidelines. And that should address the issue here.

DONNA AUSTIN: Thanks Edmon. So what I'm hearing is we develop or augment a recommendation that we already have that covers this off to say that it's a discretionary for the registry. Is that? Yeah. Okay. Then we will do that.

ARIEL LIANG: Thanks Edmon for the great idea. And I think we can draft something like implementation guideline, but essentially, basically the group agree with the gap that was in guideline 12. It's to rephrase it in a similar vein and referencing the SSAC 060. So that leave to the registries to implement. Yeah. Okay.

So moving on to guidelines 13, this one is a tricky one, just warn everybody, because the part I identified as gap, it's sort of controversial part. And in fact, I do think we may not be able to discuss this in depth because it will tie to the next agenda item, which is the IDN table harmonization topic. Do we have to go back to there's some unresolved issues and it's actually kind of consistent with the topic we're going to address in the next agenda. But I do want to just present this for completeness. And if we can really talk about this now without the full context, we can defer this to that item and then close this off.

So guideline 13, I will read a full text. TLD registries must ensure that all applicable IDN tables within IDN variant policy for a particular TLD have uniform IDN variant code points that properly

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account for symmetry and transitivity properties of all IDN variant code points set across these IDN tables. So first I highlight a uniform IDN variant code points because this is a pretty important term here and there are actually two aspects to that and this is what the guidelines trying to explain. Exceptions to this guideline vis-a-vis symmetry and transitivity properties should be clearly documented in the TLD registry's public policy. At the same time, TLD registries shall reevaluate potential variant relationships that may require to create new IDN variant code point sets due to the introduction of additional IDN tables by the TLD registry.

So the reason why I highlighted this part is because when if you recall when we talked about IDN table harmonization, we only talked about producing consistent variant domain set. So consistency is emphasized there. But I think this part is talking about additional variant code points because of new IDN tables. I believe this is some gap that we haven't really discussed in detail even in the IDN table harmonization discussion. It has come up, but I think there are some debate or resistance of adopting the idea for example cross-tracking other IDN tables in other scripts for example. So yeah, so basically that's one gap. And also related to this guideline, there are some additional notes in the appendix of guideline version 4.0. So it tried to explain what the uniform IDN variant code points mean here. So the first meaning is that two IDN variant code points or IDN variant code point sequences in one IDN table cannot be non-IDN variant code points or non-IDN variant code point sequences in another IDN table implemented under the same TLD. So that's the consistent variant label set or domain set that we, this group has already discussed in the IDN table harmonization charter question. But

then there's a second point with regard to uniform here and that's the part I highlighted is all code points in all the IDN tables under the same TLD must be collectively considered for analysis of IDN variant of code points for each of these IDN tables.

So basically what I believe this note implies is that you can't just look at IDN table in the same script. You have to look at IDN tables across all the scripts under the gTLD and maybe there are some cross-script variant code points were not incorporated then you have to also incorporate those in order to achieve the uniform goal. So, and the ending of this note is that these two measures are suggested to prevent cases of IDN variant labels being generated by different IDN tables under the same TLD to be allocated to different registrants.

And then there's a second note here, although this is not part of the guidelines, but it's tried to, again, I guess like explain the guideline were augmented. So it's a suggestion is for registries may use relevant work for the RZLGR and other sources to determine the IDN variant code point sets. So it's basically a suggestion to look at the work of the script community for including additional variant code points.

And this guideline maps to our charter question C4 about IDN table harmonization. So I have some discussion questions here, but I wonder whether we want to discuss it now or we can table this and go to this one in the next session, because I believe Sarmad and Pitinan have prepared some material to expand on this guideline and additional consideration.

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DONNA AUSTIN: Nobody wants to talk about it.

ARIEL LIANG: So I guess everybody recognized this is a tricky one. So we'll defer that. Further deferred. Okay. We can move on to the next one. I believe this is the last one. And this one, it's actually pretty general. It's a guideline 18. I would just read it, but I can probably provide some explanation why it's deferred. TLD registries should publish IDN policies or guidance related to registration of IDN labels at publicly accessible location on the TLD registry's website. So I don't think this part is super, I don't think it's very significant. It's basically just saying they need to publish their IDN policies. And then the second paragraph, in addition to general policies or guidance on IDN registrations, these should include the following, a timeline related to resolution of transitional matters, if applicable. This is not really relevant for us, I don't think. And B, IDN variant label allocation policy, if applicable. So this is really down to the implementation level is if they, if our groups, same entity principle recommendation has been adopted, then this same entity related implementation stuff or policy need to be documented and published. So I think that's what it's referring to. And then C, IDN variant label automatic activation policy, if applicable. So this is highlighted because we talked about the activation item in another guideline. So I think we kind of reached this conclusion how to address it. And then D, policy for minimizing whole script, confusable and data sources used if applicable. So this is something in the non-deferred, I think, guidelines. So we don't need to address that. And then E, IDN table as per guideline six above.



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So basically, this is kind of implementation guideline that with regard to published policies based on the output or outcome of the charter questions that we discussed. So it's deferred because it's related to all the other deferred guidelines. But maybe I'm wrong, but Michael, please go ahead.

MICHAEL BAULAND: Yes, Michael, for the record, I just have a question about this, these transitional matters. Do they include like grandfathering processes we have defined? So, or is transitional something completely different from the grandfathering processes?

ARIEL LIANG: I don't have the answer to the question, but I will take a look at how it was written in the version 4.0. But if Sarmad—Yes, Sarmad probably recalls.

SARMAD HUSSAIN: So there is actually a guideline on transition, especially transitioning from 2003 to 2008 standard, but any kind of transitional exceptions. So it's exactly what you're saying, Michael. Those are the kind of transitional exceptions or transitional mechanisms, which the registry is following. They should be, I guess, they should make that sort of public as part of their policy. I think that's what this particular item is saying. Thank you.

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MICHAEL BAULAND: But then I'm wondering if you can really put a timeline to this, because, for example, with the same entity grandfathering, we said that those existing domains and variants which do not have the same entity may exist as long as the registrant or the registrants, must be at least two, want to use them. So I'm wondering how could a registry put a timeline there, or is it sufficient to say without any explicit dates to just state that grandfathering remains active until it's gone, so to say?

SARMAD HUSSAIN: So yes, it could actually be triggered by an event rather than a time. So whatever that policy is, I think the idea is to just make it available for people to see what it's following.

DONNA AUSTIN: Edmon?

EDMON CHUNG: Yeah, Edmon, speaking personally. So I think the last part is, and what we talked about in the first part here, is important. I think it seems like a very benign thing just to tell registries to publish it, but it is important. And currently, there isn't any policy around it, and there are registries who don't necessarily publish all of these things. And especially when a lot of the recommendations actually leave it up to the registry to implement, then I think, I guess I call on the working group to think about whether there should be a recommendation at least to ask the registries to publish those policies that are in their discretion. So yeah, so I think this is still something that's important. It could go all the way to—I don't know

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whether it makes sense, but the working group can, now that it has considered those issues, can have 18 added back without changing the wording, which therefore then also applies to ccTLDs automatically, which is great in my view. And because many of the others might not be in a position where this one can be just re-added back in as easily as the other ones.

DONNA AUSTIN:

So Ariel, when we've mapped this to the charter questions, C1, C2, C4 and C6, what are the recommendations? And is there, because 18 is basically an outcome of the IDN guideline working group. So what are our recommendations and how do they map to this?

ARIEL LIANG:

Yeah, so this may not be an exact match because C1, C2, they're talking about the same entity principle. So it's related to allocation policy maybe. And then if we do develop some implementation guidance related to activation, then it will be related to the item C in guideline 18. And then C6, oh sorry, C4, that's related to the IDN table harmonization. So if there's any specific policy or guidance or whatever it is, then it will be reflected there. So it's not an exact match, but I can see Edmon's point is that maybe it's worth considering developing some kind of implementation guidance just to suggest to the registries they should publish these policies to reflect the implementation of the recommendations and in particular same entity principle and how they manage IDN tables, et cetera. But we can think about how to award it in a way that also provide registry operator the flexibility

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to do it at their discretion. But this will be like a best practice kind of implementation guidance. That's my understanding for now.

DONNA AUSTIN:

Okay. So, sorry, I guess I see a gap that if our recommendations don't actually map to some of whatever's in the guideline, then there's a gap there. And what are we supposed to do with that? So if we want to affirm it, I guess we can do that. This is pretty messy from a procedural perspective. So I'm just not sure what we can do. Perhaps where there is a gap in our recommendations, we can just do what Edmon is proposing and have a, it's not really, I don't even know if it's a policy recommendation, but just say that our recommendations have covered this part of the implementation guidance 18, but it doesn't address this other part that we have no issue with or we concur or we, yeah. Satisfish?

SATISH BABU:

Satisfish for the record. I think we should recognize the fact that this language of the implementation guideline is about five to six years old and things have moved on from there. And we don't have a one-to-one correspondence with what we are discussing in our charter and these ones. So there are bound to be gaps. And I think we should, given the fact that this one, this group has kind of done perhaps more work on these overlapping areas. I would support Edmon's proposal to sweep everything under implementation guidelines and proceed unless we find a very significant gap somewhere, but I don't see that.

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DONNA AUSTIN: Thanks Satish. So where does that leave us? You've highlighted the activation policy, so that's something we need to address. Is that why you highlighted it? Oh, it's already highlighted. Okay. Back to Ariel.

ARIEL LIANG: In fact, this is the last one in the deferred items. So, and I just want to capture what we discussed here. So maybe the action is for staff to think about with leadership, maybe develop something to reflect this one. And I think the general sense is the group doesn't disagree, but although I did see in the chat, there's some concern about item E. So yeah, please.

UNIDENTIFIED SPEAKER: There was just a little bit of back and forth in the chat about 18E because it calls out to guideline six, and then guideline 6A was also deferred and it was the first one we discussed and we have differing opinions on that, but the rest of it is in 4.1. So I think Edmon suggested that we, whatever it is, we take out E and go forward from there.

ARIEL LIANG: And we're at two minutes. Should we break?

DAN GLUCK: We'll be back in 32 minutes. Hey, everyone. Welcome back to the EPDP IDN team face to face session for day two. I think those are the right numbers. And I'll hand it off to Donna.

DONNA AUSTIN: Thanks, Dan. Welcome back, everybody. And happy birthday again to Sarmad and Ariel. So I guess I'm going to turn it over to Ariel.

ARIEL LIANG: Okay. So we're going to this really, I guess, tricky topic again. And it's the IDN table harmonization and also the guideline. I forgot the number. But it's related to that. So what I'm going to do is I will just refresh the background on this and then talk about the guy line again and give the floor to Pitinan and also Sarmad for additional data points that they want to share. So we have recommendation one. This is about the harmonization. It says all the existing and future IDN tables for a given gTLD and its variant gTLDs must be harmonized. This means that all of the IDN tables for a gTLD and its variant gTLDs must produce a consistent variant domain set for a given second level label registered under that gTLD or its variant gTLD. So basically consistent domain set, variant domain set. That's what we mean by harmonization. And I just included a little bit part of the rationale here. Basically it's to emphasize the goal of harmonization is to ensure all of the IDN tables for a gTLD must produce consistent variant domain set. I mean, it's the same thing again in the rationale portion. And the group had a lot of discussion about this and we understand this is where the agreement was at.

And then when we talked about the guideline 13 from version 4.0, there's a point that I highlighted here. That's the potential gap, perhaps as a group we haven't discussed in detail, but we

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discussed this in some other way, but not looking at it from the guideline 13 perspective. So basically point two is another aspect of what it means by producing uniform variant code points. It's basically all code points in all of the IDN tables under the same TLD must be collectively considered for analysis of IDN variant—of code points for each of these IDN tables. So basically all of the IDN tables have to be analyzed and you can't just look at IDN table under one script. You have to look at it across scripts and potentially identify variant code points across scripts as well. So I think that's what it means, but Michael, please go ahead.

MICHAEL BAULAND: I'm just wondering why it's restricted to the same TLD. Shouldn't this include all variant TLDs?

ARIEL LIANG: Yeah, thanks, Michael. Oh, Sarmad, please go ahead.

SARMAD HUSSAIN: Right. So I think this was done in two parts. Part one was within a TLD, which was addressed or through the IDN guidelines. And then it was, I think, intended that the IDN EPDP for variant TLDs will extend it across the variant TLDs.

ARIEL LIANG: Thanks. And if no other comments, I will move on to the next. So this is a slide. I'm wondering whether Pitinan wants to take over.

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PITINAN KOOARMORNPATANA: Sure. Thank you, Ariel. Pitinan here. So this slide, actually similar to the guideline, but just wanted to break down explicitly into two part of the guidelines. One is the process. Another one is the data. So the process is actually what the working group already discussed and already have the pre-written recommendation that the TLD might have to ensure that the IDN tables under the TLDs has the uniform IDN variant code points. So for that part, it's actually already addressed.

But for the data, maybe we may have to discuss more. And at the same time, the TLD registries shall evaluate potential variant relationships that may require to create when the new IDN table coming in. And as a note, we also say maybe there's some community input already exist in the root zone LGR that you can refer to.

So I will actually go to the next slide and just to give some example as well on this data. So for this, we list a pair of script and some of the characters and the code point behind it. So maybe also respond to what Nigel said in the chat. So basically the code point is the actual code that the computer recognize. So for example, if we looking at the first one, the pair between Latin and Cyrillic, the red one is in Latin and the blue one is in Cyrillic. So the red one, let's look at the first example, [inaudible] and the same glyphs for [inaudible]. So to the human eyes actually is look the same, but behind in the code point where the computer actually recognize. If it's the Latin code point, the E is 0065. And if it's a Cyrillic code point, the E shape is 0E35. So basically these two may be perceived as the same if the user look at it as the



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same URL or same domain names, but behind it can be a different one.

So let's take some scenario. Like for example, at the beginning, this TLD, they offer only Latin. So they have Latin IDN tables. And for that, they haven't defined any cross script variant because they just offer Latin. Then maybe next year, they actually add the Cyrillic script under the same TLDs. So now they can offer both Latin and the Cyrillic. Then this such case, if the 0065 and 0435 are not defined as variant, then there's some potential that they have the same glyphs of the labels being assigned or registered by the different registrant. So that's some of the data we would like to present and some example here. So Latin Cyrillic, there's quite a number of code points that look the same. And on the third column, the fourth column here, we just note the code point that is actually listed by the communities that has to, they actually define through the root zone LGR project that these should be defined as variant. So for Latin Cyrillic here, Latin Greek also have something look similar. Cyrillic in Greek also. And moving on from the Latin base, we also have the Neo-Brahmi set like Devanagari, Gurmukhi, they have a lot of commonality. Kannada and Telugu as well. And then the last one, so in this page is Hanja and Hangul. So Korean and within Korean, they have a Chinese character and Korean characters that can be the same. So this page is about cross script variant. And maybe can we move to the next one?

This also another set of example that's been defined by the community for this page is for within the script. So the first one is for Japanese, actually because Japanese, they're using the mix

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Katakana, Hiragana and Kanji all together. So there's possible that they have all these mixed labels as well that can look like the same label. For Arabic also similarly, they define the in-script variant as well. So for this is some of the data point that actually community already defined and they are all—if they want they can look at it as the reference. Next slide please.

For this then just to lay out. So these are examples. So if you recall, actually in the previous two pages, Latin and Cyrillic have more quote points on this, but these are exactly the same clips. So there are quite a number, like at least 25 as we identify here. So there's something that can be a potential phishing or risk on this if you're not define them as variant. So this is Latin and Cyrillic examples. Next please. And this is Devanagari and Gurumukhi. So quite a few as well. And all this means it can combine to be multiple words. Next please. This is Telugu, Kannada. This is exactly the same, but for Telugu and it seems to be moving. Yeah. So Telugu and Kanada they have very similar as well, which is not listed here. This is a more exact one. Next please.

This within Japanese. So they define between Katakana and Han as one set and then between Hiragana and Katakana as well. So these are also two of the same shape, but different quote points. Next please. And here is within Arabic. So for Arabic it's not about the exact shape for each quote point, but this when it's combined into a word, sometimes the shape transform and it's actually look the same. And this part maybe Hadia or Sarmad can also add as well. Maybe next please. I think that's all. So let me pause here first on this data. So we actually have all this data already available by the script communities through the root zone LGR

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projects. And I guess more on the question that harmonization is two part of it, the process to make sure that all the IDN table process produce the same set under the TLDs. That's already discussed. But on the data part, I guess maybe the question is how can we incorporate all this information already done by the community into the RO decision when they decide on what would be the target of the harmonization. So let me pause here and see. I'm happy to take any question.

SARMAD HUSSAIN:

So I think the main motivation of harmonization, as you can see, is to prevent DNS abuse or address security concerns, where if the tables are not harmonized, then different registrants can register exactly the same label. And this is not one or two labels, right? It's 24 characters between Latin and Cyrillic. So it's like thousands of labels, which can potentially create problem under a TLD. Or even hundreds of thousands of labels, right? You can create so many different configurations of these labels. So this is a very significant security gap, which we try to address through the IDN guidelines. And obviously, now it's come to IDN EPDP to address. It impacts both the Latin script community and the Cyrillic script community if you're talking about Latin Cyrillic. But that's not the only case, right? It goes across through many different scripts. And for the in script example, like Arabic, this becomes applicable there. If somebody is implementing an Arabic language table, and they add like an Urdu language table, then they need to harmonize even within the script. Because some of these characters are in Urdu versus some of them are in Arabic language and so on.

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And basically, the variants are already identified by the relevant script communities. This data is actually verified by the script community and available through root zone LGR and other means. And, again, the idea behind the IDN guideline, if you see was that all the code points across all IDN tables need to be considered together under a particular TLD. And now obviously, this needs to be extended to variant TLDs as well. So that's sort of what is being presented here. Thank you.

HADIA ELMINIAWI: Thank you. This is Hadia. So I was under the impression that when registries actually do harmonize the tables, by default, they do use this information developed by the—No they don't.

SARMAD HUSSAIN: Yeah, I was saying that at this time, the harmonization is not done. So this was actually being suggested as a process for the registries.

HADIA ELMINIAWI: So currently, no registries actually are doing any sort of harmonization. That's my first question. And then my second question, so going forward, definitely they will need to harmonize the IDN tables. So will they by default use this information developed by the community or can they do something else?

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PITINAN KOOARMORNPATANA: Right now, so the harmonization is not being done as a harmonization at the moment, because it's more introducing now, as we discussed. But if the question is whether they have variant definition, some of the, for example, Cyrillic tables, they do have variant to the Latin, some of them, but not always. So it's not consistent. It depends on the RO at the moment. For your second question, if the RO would do the harmonization, will they always refer to this data? Right now, it's encouraged that they can use as a reference, but not a must.

HADIA ELMINIAWI: So just a follow up question. So I guess what we need to do is actually make registries like use this defined variant, defined code points, or would it be up to the registry?

DONNA AUSTIN: So I think we have a recommendation that is recommending harmonization moving forward. So we've covered that piece. If I understand correctly, what Sarmad and Pitinan are talking about is prescribing the way in which the harmonization was done and is done. And I think when we discussed this previously, it was at the discretion of the registry. So I think what Sarmad and Pitinan are doing is showing us additional data that goes to the suggestion that it should be prescribed in some manner rather than being left to the individual registries to determine. We have Maxim, Sarmad, and Satish. Maxim?

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**MAXIM ALZOBA:** Just for clarity, we're speaking about the data structure and abstract theme, and it's not used by registries. Registries, they use the same data structure, but they don't take it as input. It's just a presentation for ICANN, for IANA, for maybe registrars, for the public. So it reflects what's inside of the databases and the registries cannot use it as input. They can use it as reference because it's too deep in the data systems of registrars and registries. So to prescribe some formal data structure to be used as a reference, yes, but to prescribe some particular way of input into data platforms, definitely no, because it will require so huge investments of money that it's going to be cheaper to sue ICANN because it's an investment of millions of dollars for no benefit, actually, because rewrite the code of all registries' platforms so they take abstract IDN tables as input is impossible. Thanks. Because it's presentation, it's not input source of data. Thanks.

**DONNA AUSTIN:** Thanks, Maxim. So I guess a question I have is with the current practices, what mechanism do registries or registrars have in place to mitigate against the possibility that Sarmad and Pitinan are suggesting might happen in that you'd have the same, on the face of it, the same string being registered twice, because one's in Latin, one's in Cyrillic. So I guess that's a question, what mitigation is in place. So Sarmad, Satish, Michael and then Maxim.

**SARMAD HUSSAIN:** So this is Sarmad, I think we're not really suggesting the process. What Maxim was referring to was actually the process which registry implements. The registry can use whatever process they

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want, if they have already coded software, they can keep using that and we're not even suggesting they use LGR format or label generation rule format. The only thing we are suggesting is that this data which is available to us through the community should be used through whatever process the registry is using, so that the registrants are at the end of the day protected against this kind of, I guess, possible security issues. So I think the suggestion is not to recommend any particular process. It is just to say that the tables should be harmonized, whichever way any of the registries would want to do that. The only end result which is being I guess, requested is that if I register apple.com or apple.tld, sorry, didn't want to take an example of a particular TLD. So apple.tld, then somebody else should not be able to come and register Apple in Cyrillic, which is possible, exactly same glyphs, apple.tld and try to create a phishing website. And as you can see there are 25 almost identical glyphs here just between Latin and Cyrillic, which have been identified and those can, as I said, create not one or two, but hundreds of thousands of possible strings which can actually be phished. Thank you.

SATISH BABU:

So I think, first of all, during the discussions earlier, we have said that we are leaving it to the registry to kind of implement this and the basic software doesn't have to be updated. It's only the IDN table, which is an input for that software that requires an update. So it's not an invasive update in any case. Secondly, when you look at the costs, we have to balance the actual cost, which is not really, I don't think it is really significant, but I'm not an expert. With the cost of all kinds of abuse and destabilization of the DNS that

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can be caused by not doing this. So we have to offset these costs and look at the overall big picture. Thank you.

MICHAEL BAULAND:

I wanted to try to answer your question. Don't know what registries and registrars do at the moment. Registrars don't do anything. And I think in the future, there's nothing for them to do because they just register domains and the registry will tell them whether that works or whether it's a variant and does not work. So luckily we are out of, yes, nothing to do there. For registries, what they are doing at the moment, this is difficult to say because there are several systems. I can speak for our system that we have a mechanism with this canonical form, which I presented a while ago and where there's also a problem in that mechanism because in some special cases it does not work as expected, but we have to fix that. But for the standard cases, this works quite fine. And so far there hasn't been any problems. So it's more theoretical thing, which I realized when we talked about this, that there could be cases where it's not working as it should be.

MAXIM ALZOBA:

Actually in answer to Satish, IDN tables are not the input for platform. They just use this reference. The reason is in platform, whatever you can find inside the service systems is something which you allow to add. And basically a typical registry just filters out all the symbols which are not allowed. And if in the end the string changes due to any forbidden symbol, it's not going to be registered and it's not going to pass into the table. Thanks.



DONNA AUSTIN: Thanks Maxim. Ariel, are you able to put up C5, the recommendation for that?

ARIEL LIANG: Actually, I do have a question if I may. And I think I'm just trying to help the discussion move forward. As what Donna did in a previous chat or question, she asked a question that's I guess in people's minds and she asked it straight away. Do you think the group would recommend the registries to look at the community's work on variant definition and then take that into account for their IDN table harmonization? Is that something the group agreed to recommend? Just look at the work and consider that for harmonization or this is something the group doesn't want to recommend at all. So I just wonder what would be a straightforward answer to that and maybe that can help us just put a clear cut here. And because we're talking about this for a while and if there is a straightforward answer, then it will be helpful.

EDMON CHUNG: So Edmon, I guess speaking personally, but also doesn't really actually matter for this particular statement. I think it makes a lot of sense for any registry looking into providing IDN services to learn what the community has done. So your question seems to be, I would like to hear if there is anyone who say no to it because it is not a simple issue. And if a new registry coming in and or considering a new language or whatever, if they don't learn from the experience, it is kind of dangerous, isn't it? So that question

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seems to me that it has to be a yes. And if it's not a yes, I'd like to hear from the group why it is not a good idea to recommend to registries that provide IDN services to at least have knowledge from some of the experience that is put forward from the community.

DONNA AUSTIN:

My sense is that there must be, I think we can find a way to accommodate what Sarmad and Pitinan are suggesting so long as it's not a hard requirement or mandatory on the registry. So there's still that flexibility for the registries to implement according to what their own policies are. But to your point, Edmon, if there's some way that we can incorporate what Pitinan and Sarmad are suggesting, but it's just not a hard requirement, I think is the way to go. Because my recollection of the conversation that we had around this whenever we did that the first time is that this was really this is at the discretion of the registry operators, how they do this. And I don't know that when we I think when we had that conversation, there was some discussion around what Pitinan and Sarmad are bringing back here now. But I'm pretty sure it wasn't something that we agreed to move forward with. So my sense is that we wouldn't get it through as a hard requirement, but maybe there's some way to do it as implementation guidance or something like that. Maybe as a soft recommendation rather than a hard recommendation. So Michael, Nigel and Hadia.

MICHAEL BAULAND:

Yes. Michael, for the record. I think it's okay to mention those reference LGRs and state that these could be used or could at

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least play as a role model to do your own harmonization. I'm just wondering, this harmonization, is it just the fact to make IDN tables consistent in the way that variants are transitive and or is it also the requirement to introduce new variants if characters of one IDN table are similar enough to characters of another IDN table/script? Because the first one can easily or can programmatically be checked and validated if that has been done. But the second one, I'm wondering how this will be checked that the registry actually did the harmonization, because the similarity can be quite subjective and some registry might say that character one and two are different enough from their point of view to not make them variants and another registry might say, no, no, they are almost the same. We have to make them variants. And who's the one to make the call to decide whether this is actually the case. And is the one registry that sees it more lax and says no, they're not variants, are they in breach with this recommendation because they haven't really harmonized the IDN table? I'm speaking from experience from the Latin generation panel of which I've been a part of and we had some very long and difficult discussions when we were looking at characters to decide whether we should call them variants or not, and there have been very different views just in our generation panel. And I imagine in the whole world, there might be even more different views. So I don't know how this can and will be checked whether the harmonization process has been done to ICANN's satisfaction.

DONNA AUSTIN:

Thanks, Michael. Nigel, Hadia, Sarmad and then Edmon.

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NIGEL HICKSON:

Yes, thank you, Nigel, for the record. So I think this is very difficult and I can't speak for anyone else around the table, but obviously, some are steeped in the detail on this. But from my judgment just as a normal sort of policy person, I suppose, if I was a minister or a senior official in the government listening to this, I think I'd be somewhat worried because—and this is where I think we just need to hear from Sarmad on a consistency check. We've been doing a lot of work in this EPDP, in this policy development process on variants. We talk a lot about equivalent. We've paid a lot of attention to the current rules and the script communities and the rules that they have laid down. And here we have a further recommendation on these code points, which I imagine is all linked to the rules that are set down to ensure that there's security and stability and registrants, there's predictability when names are being or tried to be registered. And although we have to be cognizant of the technical and the cost implications of carrying out recommendations and how these recommendations are carried out and there might be lots of different ways and we shouldn't be prescriptive, etc., But presumably, if this particular recommendation is not carried out, then we undermine some of our other work. Is that true? In other words, this recommendation here is not a standalone recommendation, as I read it, it's part of a consistent set of recommendations. So I mean, how serious is this? This is the question really for Sarmad I think. Thanks.

DONNA AUSTIN:

Thanks, Nigel. Hadia.

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HADIA ELMINIAWI:

Thank you. This is Hadia for the record. So I have several questions here. So if actually we decide not to use the code points developed by the language communities, then first, how do we ensure harmonization? And what's the meaning of harmonization then? And then second, and then most importantly, how do you ensure security, the security of the domain names? How do you ensure that you do not get like phishing attacks? So looking at the code points, the for the Arabic script and Arabic language, and you have a letter, yeah, one with two dots and the other without the two dots. However, this is basically the same character. But visually, it doesn't look the same, but it is the same character and is used similarly. And if you have a domain name, using that character, and another using the one with a double with the dots and another not using the character with the dots, and then you have them as two different domain names, obviously, this is like an invitation for abuse, DNS abuse. So, how can we ensure the security of the domain name space? And then the second issues, then, so we all agree, I get the sense that we all agree that harmonization is required. But then, how do you define harmonization if you actually don't agree on the code points that support that harmonization? And if harmonization is not done correctly, then you could have two second level domains as variants under one top level domain but not as variants under another top level domain. So, is this actually something that we want? Thank you.

DONNA AUSTIN:

Thanks, Hadia. I think just a general point on DNS abuse is that you, you can mitigate, but you can't eliminate. And I guess that's

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the part of the discussion we're having here. We're just trying to mitigate, understanding we can't eliminate. So, and I think what Sarmad and Pitinan are suggesting is this is one way to give a little bit more security to ensuring that mitigation. So we got Sarmad, Edmon and then Maxim.

SARMAD HUSSAIN:

Thank you. I'm just going to try to address the comment which Michael made earlier. So there is a, cannot be a 100% solution for every problem, but it doesn't mean that we should not consider a solution which gets you to 98%. And I think from a perspective of ability to define, we're not talking about similar code points. I understand Michael's comment that in, for example, I think probably I think Latin GP was one example where there were varied views, but beyond Latin GP, I think there was generally consensus on what variants were defined. And then even for Latin GP, eventually, the community from a very different set of expertise deliberated for multiple obviously weeks, and then came to a solution which eventually everybody agreed to. So that kind of diligence and that kind of effort which has been put into this process to determine this data and this data is quite clearly defined in, for example, root zone LGR and then taken up in other LGRs as well. But that kind of diligence and that kind of expertise is hard to put together. Just to give you an example, for the Arabic GP, there were 35 members from 22 countries, which spent good part of three years to come up with this definition which everybody agreed with. Can a registry operator—Is that okay for, for example, a registry operator to take on? And similarly, for other scripts, we had about 60 people, we have in New Brahmi

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generation panel who worked for multiple years to define variants between, for example, all the different possible pairs of scripts. So that level of expertise, that level of diligence that's already gone into the process. And there's therefore a reasonable argument to reuse that data rather than try to invent that data again. And so that's sort of what we are saying. And the definition of that data is not ambiguous at all. It's very clearly defined what variants are and what variants are not in roots on LGR, for example. Thank you.

EDMON CHUNG:

Edmon speaking personally here. So I said personally, I would like to lend support to having a stronger requirement for registries to consider this. So again, it's sort of like, I guess what Michael and Donna, you said, the soft part is the result. But I think the hard part is registries must have considered this. The result of the harmonization, I understand that Samad is saying that it's based on a lot of expertise, but I think the jury is still out for what is, quote unquote, correctly done. So, I think if we can frame this in a way that it is a hard requirement to actually doing harmonization, but a soft requirement of what the results of that is, and that can be implemented in a way whereby a registry looking to introduce IDNs or introduce a new language or script is asked a particular question on this topic, and they have to answer it, clearly, what they did, or whether they referenced a particular implementation. And then I think that should be sufficient. As to, in the future, I'd like to think that maybe somewhere down the line we would figure, find out that it really doesn't matter. There's one possible outcome. But there could be another possible outcome that it's creating a lot

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of confusion, IDNs is still not, it's still very problematic and so on. So, is there any way that we also put a review on this? Because I think we're at the cusp of a larger scale implementation with the variants, with all this things that are going to be in place that will help already. Because prior to this, we don't have IDN variants policies, we don't have these items as well. Of course, registries do it voluntarily and those kind of things. But now that we have this, maybe we want to have a hard requirement of harmonization, a soft requirement on how the actual harmonization is realized. And then a definite view on, a definite kind of horizon to review this and to potentially make it a more standardized approach across registries. Because we already have the recommendation on grandfathering. So in the future, if this is more standardized, we already have the grandfathering process and registries can implement through that transition as well. So, I don't know, hopefully this is useful input.

DONNA AUSTIN:

Thanks, Edmon. So, Ariel has highlighted that in the implementation guidelines, so understanding that we do have a recommendation about harmonization and where, we're not saying how that needs to be done, but the implementation guidelines has the language that registries may use relevant work for the root zone LGR and other sources to determine the IDN variant code point sets. So whether that's something that we could include and if that's acceptable to the group, and then Edmon, to your point, it seems like this is a possible trigger for further work for the IDN working group to see whether at some point in time there's research to see what's going on with the IDN tables and



whether this needs to be a hard requirement or not. So maybe that's something for the IDN working group to consider at a future time. So Edmon, and then we'll go Maxim and Michael and Abdulkarim.

EDMON CHUNG:

Okay, so just want to quickly add to that. I guess what I'm also suggesting is that even at this point, we add to what we already have the may part to add a must part in there that says the registry must show that they have done this, and therefore in the implementation, whether the applicant guidebook on this or in the future, whatever the staff puts in place, could have a place where it asks the registry, what have you done on this before it's processed. So there is a difference there. I'm suggesting a more hard requirement that the registries must answer to, but the answer could vary in different cases.

DONNA AUSTIN:

Okay, so I don't know how that works with existing registry operators because there's no application process that they need to go through. And I am conscious that within the registry stakeholder group, this has been a long standing issue with IDN tables so I do understand it's a very sensitive topic. So, Jen will have to go back to the group and get a sense of what's going on and Maxim. So with that, Maxim, Michael and Abdulkarim.

MAXIM ALZOBA:

Speaking about reviews of the process, GNSO experience issues when too many reviews are happening the same time. General

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lack of volunteers in the community. And that's why, if we ever recommend the review of IDN tables, it should be done on some trigger and not just because a few years passed. Speaking about the necessity of resolving it because it's going to prevent DNS abuse. I'm not so sure because many, many, many examples of DNS abuse, like 10 or 20 years old involve issues with the standard Latin script. Like small L and large I, one or zero and O letters. And we're not going to even speak about it here. So it's just minimization of risk.

And about asking questions. I think it may be something for the technical part of the application, but it's more relevant to use it in technical tests of the backend, which claims that they're capable of IDN variants. And you just prepare tests, they pass it, then they're compliant and they can use it. That's it. Thanks.

DONNA AUSTIN: Thanks, Maxim. Michael, and then...

MICHAEL BAULAND: Yes, Michael, for the record, I actually have three comments. Donna, you just referenced a section shown by Ariel, I think, about consistency of IDN tables. And you asked whether it may be sufficient to put that into the policy, if I remember correctly.

DONNA AUSTIN: The last [inaudible] point that's on the screen there. So whether we can add that to our current recommendation for harmonization, and whether that would work as the kind of the soft requirement. It

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is a May, so I appreciate it doesn't address what Edmon was suggesting, but at least it's something to, as a starter.

**MICHAEL BAULAND:** Okay, I just wanted to mention that that consistency is not enough for the harmonization. Because if someone has only in-script variants in all their IDN tables, then this is consistent across the whole TLD, but it's still not harmonized in the way that what we've seen before cross script variants. These variants are not considered at all. So this harmonization consists of two parts. The consistency is an important part, but it's not sufficient.

And the second point was to what Sarmad and what you said about the root zone LGR already says what variants should be there. So can we take it as the variants defined in the root zone LGR, those are the minimum variants that all TLDs will have to implement if they support that specific code point. That's, of course, the condition if they don't even support a certain code point, there's no need to have a variant. But if they have two code points, and those two code points are variants in the root zone LGR, then they have to make them variants in their LGR too. Is this something you require? And with the third point, I'll wait till Sarmad responds to this. If he wants to respond.

**SARMAD HUSSAIN:** Not to jump the line here, but still, I think that's the, I guess, only definition of variants we have, right? There is, obviously, if the task's given to different people, they could come up with different definitions based on their understanding of the script. And that's

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why the community developed this generation panel process, which said that as a community script community that needs to be answered so that we can have a cohesive and consistent definition. And for ICANN, of course, we don't have the expertise. We've gone to the relevant communities, which have their expertise and requested them to give us the answer. And that's the answer they have given to us. So for us, that is the definition of what variants are. And so if you're asking what we are suggesting, the suggestion is that we take on the input from the community. And maybe if there is an exception which needs to be made, then that should be done on an exception basis rather than starting the other way around where you start from a place where you do not, for example, take the input from the community into consideration. So that's only the first point we have. Thank you.

MICHAEL BAULAND: Okay. So, the problem I see is that it's maybe unclear for registries to find out whether they have a consistent harmonized IDN table. So maybe saying something like the variants from the root zone LGR, that they must be in that to be harmonized. And you may add more. Might be a way forward, because I see a problem with a not clear definition in that context.

And the third point I wanted to make is regarding grandfathering of the existing TLDs. There is the question, do we have to make a policy if and when they have to be grandfathered? Or is this out of scope here?

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DONNA AUSTIN: Last one, I don't remember whether we have a grandfathering on the harmonization of tables. I guess that becomes the requirement once the policy is effective.

MICHAEL BAULAND: Yeah, but you need to give the registries at least some time to make their IDN tables harmonized. You can't say it's effective now and if you're not harmonized tomorrow you're in breach with ICANN policies.

SETVE CHAN: Just in respect of Michael's concern, the policy effective date is never a surprise. It's always, there's a policy publication date, and I think it's usually 18 months actually. So, and then there's a policy effective date. So it's never a switch that just turns on as a surprise. Thanks.

DONNA AUSTIN: Okay, so Abdulkarim.

ABDULKARIM OLOYEDE: Okay, thank you. This is Abdulkarim for the record. I just wanted to point out that the issue of harmonization has to be looked at from two different angles. And one is harmonization of the code points. And the other one is harmonization of the solution across all registries, especially given the fact about what Edmon was mentioning about hard and soft harmonization. Because it might

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be a bit confusing if you're looking at it from the point of view of just harmonization of this code point.

Then the other point I wanted to mention is the issue of DNS abuse. Yes, I agree that it might not completely solve the problem of DNS abuse, but just like what was mentioned, even reducing it is also a way forward. Thank you.

DONNA AUSTIN: Thanks, Abdulkarim. Hadia, and then Maxim.

HADIA ELMINIAWI: Thank you. This is Hadia again. So, my initial thought here that the, or my actual thought here is that using the word may, registries may use relevant. The word "may" does not actually reflect the importance of having a true harmonization and does not actually reflect the actual impact of getting it wrong. I actually like the idea that Sarmad introduced, which is maybe allowing exceptions on like one-to-one basis, I think this is what he said. And another point here, we need also to remember that registries that have different opinions about the code points developed by the community could always like go back to the community and introduce their thought and maybe people get convinced and it's added. So, it's not like those tables cannot ever be changed or updated if there is a reason for this. Thank you.

DONNA AUSTIN: Thanks, Hadia. I just want to call out something that Sarmad has put in chat, and that's that the root zone LGR was, it's already

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been implemented at the top level and it was developed, my understanding is specifically for the top level. Registries have been doing their own thing with IDNs at the second level, developing their own tables for a long time depending on whether they carry IDNs at the second level. I don't know whether there's been any research done to understand what the level of DNS abuse is in those registries, but if I remember the conversations we had previously around this is that there's a lot of work that's done by the registries to develop those tables. They have been modified, evolved over years, many of those tables are shared amongst registries, but I don't know to what extent any research has ever been done to understand whether there are real DNS abuse problems and what needs to be mitigated.

MAXIM ALZOBA:

Just wanted to say that if we're speaking about the second level and the applicability of LGR, we need to understand that the generation panels, they consist of technical and linguistical background, individuals with such backgrounds. And they basically have no responsibility for whatever they invent. So, if we hard-code into contracts of registries that they have to 100% be compliant with the new LGRs applied to second level, they will have to do it despite the situation that itself such decision might undermine security of the Internet. Because, for example, if a lot of domains which are already registered are not compliant, what should be done? How the end users could predict such situation and minimize harm and uncertainty caused by it? So, the acceptance of whatever invented there on full auto is potentially a bad idea. So, there should be a separate process. Thanks.

DONNA AUSTIN: Thanks, Maxim. Sarmad?

SARMAD HUSSAIN: So, a couple of things in response to what Maxim just said. First of all, in all of these panels, there was a very active participation from ccTLDs and also, in some cases, gTLD registries. So, I think that part of expertise was involved. But in addition to that, at the end of the day, registry operators are, of course, or this whole, I guess, process is creating domain names, domain labels. And the users of those domain labels are these communities, which were looking at assessing these, which obviously included community members and linguists and other roles in addition to DNS experts and IDN experts. So, they were able to look at it from both perspectives, not just the perspective of, I guess, the technical side of it, but also from the side of the community being able to use those domain names. Thank you.

DONNA AUSTIN: Thanks, Sarmad. So, what I'd like to do is just take some time to see the notes and see what the potential output is here. I think what I'd like to suggest is the hard requirement on harmonization and the soft requirement about using the root zone LGR and other sources to determine the code points. I don't know that that's going to satisfy you, Sarmad, or potentially some others that are in the room, but I think it's a potential starting point that that's actually there. And to Edmon's point that perhaps there's we should mention that we think further research or study should be done



about IDN tables at the second level and how they're developed and to—Jim Galvin would often say what's the problem we're trying to solve and I'm not sure I understand that there is a problem here. There's potentially a problem, but I don't think there's, I haven't seen any evidence to suggest that there's a big problem here. So maybe it's a, we find a middle ground here, but also recommend that further work needs to be done in this area, given that there will be introduction of more IDNs and variants at the top level which we haven't seen before. And maybe it's further work for the IDN working group. So maybe that's the middle ground that would be acceptable to take forward. Of course, we develop language around that. We'd bring it back to this group to consider and see how we feel about it. And we can have another conversation about it when we have the text. If there is any evidence out there that that there's a problem and what the size of the problem is, I think that would be helpful to our discussions. So I got Nigel and then Michael.

NIGEL HICKSON:

Yes, thank you very much and I'm sure that's very sensible to think, think further on this. I suppose it's not just a language issue but if we're saying in a recommendation that we're using a must in the first sentence, it must be harmonized and then we're saying, well, we recognize that there's ways of doing this, and we're not dictating the way you should do this, but the sense of that first sentence is that they must be harmonized. There must be a method to be found. And if the sense of this room to an extent is that this may not be—no possible but it may not be appropriate in

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all cases, then we shouldn't be making the first recommendation perhaps, but it's just a thought.

DONNA AUSTIN:

Thanks Nigel. So I think the harmonization piece, I think there are registries that have harmonized—That their IDN tables are harmonized now and I think it is recognized that it's a practice that all registries should be undertaking. But how they do it is different. So that's the discretion that the registries currently have. And that's what we're suggesting continues, but they may use the relevant work of the root zone LGR. Michael and then Satish.

MICHAEL BAULAND:

Yes. Michael for the record, just a quick clarifying question. If I understand correctly, the registries don't have to offer variants. They can run their system in a way that they never offer variants to their users, but even in that case I guess they have to implement blocking variants. Because otherwise, if they offer Latin script and Cyrillic script, if they don't implement blocked variants, you would still have the problem that the examples we just saw would be possible to register domain names looking exactly the same. So their tables are not harmonized. So even registries not offering variants still have to implement variants in the back end to be able to be compliant, right.

DONNA AUSTIN:

Thanks, Michael. Satish.

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SATISH BABU: We are doing IDNs and variants for the first time. And this is a kind of risky. Sorry?

DONNA AUSTIN: At the top level.

SATISH BABU: No, I think overall there's going to be a push for variants. I mean, we are opening up variants at the top level, but it also means that there will be corresponding rise in the registrations or potential registrations at the second level. So to walk into this without adequate preparation, including harmonization, would be very risky. It can result in all kinds of potential abuse. So I support Edmon's proposal that we have to say a hard recommendation for the harmonization. But I was just wondering here, Michael has talked about the reference LGRs which already exist. These are approved. Is there any way to reuse existing work rather than start from the very scratch? Otherwise, you kind of fall back on blocking as has been proposed. So I think these are various options that we might have to consider. Thanks. T

DONNA AUSTIN: Thanks Satish. So what I think would be really helpful to this discussion, but I think it would take a long time to pull this information together, is actually understand how many registries actually offer or have IDN tables, how they operate, how many registrations they have of IDNs at the second level. So we don't have a data set to understand what we're really dealing with here and whether there's a problem now and the potential for a problem

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later. How many registries actually do harmonization now and how do they do it? So we're making assumptions about practices, but we have no data or insight into that. So I think that information would have potentially been really helpful to our discussion because we could put things into context, perhaps. So we got Maxim and then Michael.

MAXIM ALZOBA:

Just for clarity, if a registry has IDN, offer IDN, only one script, and they do not allow variants, they shouldn't have anything to do with the, I'd say, calculation of variants or whatsoever. The reason is if they do not offer variants, if they do not allow it in the TLD, they do not have to check things like that because it's a huge material change from the legal point of view of contractual, of ICANN contracts, because they will have to invest a lot of money into something they are not going to use. And it will lead to a situation where the registry constituency most probably will not ever pass such change because even if we have good ideas, but they do not lead to some meaningful output and demand community, I mean, demand from registries and registrars, something without any return, it's not going to pass. So I suggest we produce a language clear enough saying that if the registry is offering only one IDN table, then they don't have—Okay, let Michael speak. Thanks.

MICHAEL BAULAND:

No, continue, I have a different point.

DONNA AUSTIN:

Have you got any more, Maxim, or?

MAXIM ALZOBA: No, that's it.

DONNA AUSTIN: Okay, thank you. Michael?

MICHAEL BAULAND: Okay, my point was regarding that we probably want to enforce the requirement for harmonization, but not how this is done. But I see a problem with requiring harmonization, but not really defining what it means, what the exact definition is that IDN tables are harmonized. We need to say some way that registries can check whether their IDN tables are actually harmonized. Otherwise, it's difficult to require it without saying, even if we say one possibility is to use the reference LGRs, but that won't be a solution for all registries because some maybe don't want to use the reference LGRs. And if they still have to have to have harmonized IDN tables, we have to tell them what this exactly means.

DONNA AUSTIN: Thanks, Michael. So, do we have that? I think.

ARIEL LIANG: Please bear with me, I'm losing it slightly, but we can pick up on this tomorrow morning. Maybe we'll all feel refreshed. I think when we talked about recommendation one, we did explain what harmonization means. It's basically producing consistent variant domain set. And then there is a visual, which was contributed by

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Dennis. It's basically, if you look at table one, there's codepoints A and B, there are variants. But in table Y, the codepoints A, B, they don't have variants, but they're the same codepoints in table one and table two. And then to harmonize is being sure the codepoints A and B are variants in both table one and table two. But they're talking about the same codepoints. So, I think the gap, I guess, Sarmad, Pitinan, and they're pointing to is, well, you have different codepoints, but they're also looking confusingly similar or exactly the same. How do you identify them as variants if you don't look at them all together? So, it's going to be a gap for those variant relationship. And then it could be two ways. One is registry. They do their work and manually identify these. Or they can look at the existing work of the community because they have done that work at identifying this. So, what would be the good way? Like, if we don't mandate the mechanism, this problem still needs to be resolved. And it's just we have to kind of recognize there could be such problem.

MICHAEL BAULAND: Consistency is the easy one. Because this is clearly defined. And I have no problem with that. The problematic one is really the decision to make codepoints of variants that are, from a computer point of view, not the same because they are different codepoints. And therefore, human beings, they are more or less the same. And therefore, they should be variants. And we somehow need to, if we require registries to make those codepoints variants, we have to define which codepoints need to be variants. At the moment, the only consistent possibility I see is to say everything in the root zone LGR that is considered to be a variant. If you use it,

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you have to make that a variant too. Because otherwise you have always arguments that I don't think they look similar enough. And who is the authority to decide that? And the root zone LGR might be the authority for that.

DONNA AUSTIN: Thanks, Michael. So I guess it's time to draw a line under this. But Sarmad and Pitinan, I'd like to come back to you and just say, what's the ask? So if you had to draw up language for this or a recommendation for this, what would be the ask? And you can come back to this tomorrow.

SARMAD HUSSAIN: So I think what we are suggesting is that we use the variant definition, which the community has given us. The community which uses those scripts for harmonization, because that's only, I guess, that's what obviously we've developed through a very open process. And if I think exceptions need to be made, perhaps that may be possible, then I think it should be then a good way would be then each of those exceptions should be sort of explicitly—if there's a reason for that exception, that should be documented by the registry, which wants to, for example, do something differently. And I think that would be, for example, a good way of starting. But again, as I said, that's a conservative point of view. We are depending on the definition which the community has given us. And so, at least, I think what we are saying is that the source of data should not be arbitrary. It should be based on what communities deliberately discussed and finalized. Thank you.

DONNA AUSTIN: Okay, thanks. All right, we're going to call it for today, I think. How much more have we got to get through, Ariel?

ARIEL LIANG: So, good news is we're way ahead of schedule. So, we haven't completely closed this topic off, but this is probably the last real, like, difficult topic that we're handling. And then tomorrow we will have the glossary we will work on, and then mainly about the variant domain set definition. That's a tricky one, and the source domain. And then we will talk about the terminology consistency, like activation versus allocation. And I think Edmon's topic about deletion of source domain name. We thought the group already reached agreement, but he keeps mentioning stuff. So, we'll air this out. So, basically, four more things, but I think we have done a great job in basically all of the charter questions. We have had initial discussions, some of them, most of them, we have reached a place we can draft recommendation language. Just this part, I think we should still try to kind of fine tune it a bit, and hopefully we'll reach a place we can draft some language out of the discussion here.

DONNA AUSTIN: One question I do have for folks, so I think we go through to 3:00 tomorrow, is that right? Yeah. 3.30. Does anyone intend to leave earlier than that?



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EDMON CHUNG: I think, based on our progress, we all can intend to leave earlier than that.

DONNA AUSTIN: I'm conscious that we're all pretty fried. But I just wanted to check, so if there's stuff that we want to do up front early while everybody's in the room, we can redo the agenda. I mean, I think my flight out is at 8:30 tomorrow night. So I think I'm good till 3:30. But I want to be out the door by 4:00 because I don't know what the weather's going to be like. Yeah, so I just I just wanted to double check on it. Okay. Thanks, everybody.

DAN GLUCK: All right, thank you everyone we'll be back here at 9:00 Am tomorrow.

**[END OF TRANSCRIPTION]**