

# Registries Stakeholder Group Statement



## Additional Script-Based Reference Label Generation Rules and Related Updates

Date statement submitted<sup>1</sup>: 3 March 2023

Reference url:

<https://www.icann.org/en/public-comment/proceeding/additional-script-based-reference-label-generation-rules-and-related-updates-19-01-2023> .

### Background<sup>2</sup>

ICANN seeks community feedback on

- seven new script-based reference LGRs:  
*Armenian, Cyrillic, Greek, Latin, Japanese, Korean, and Myanmar.*
- 15 updated LGRs :  
*Belarusian Language, Bosnian (Cyrillic) Language, Bulgarian Language, English Language, French Language, German Language, Hebrew Language, Hebrew Script, Khmer Script, Macedonian Language, Montenegrin Language, Russian Language, Serbian Language, Sinhala Script, Ukrainian Language.*
- The remaining Reference LGRs have the Unicode version updated without normative changes. These are being released for Public Comment to gather community feedback for finalization.

### Documents

- [Second-Level Reference Label Generation Rules \(LGRs\)](#)
- [Overview and Summary](#)

### Related RySG comments

- [Root Zone Label Generation Rules Version 5 \(RZ-LGR-5\)](#) (May 2022)
- [Proposal for Myanmar Script Root Zone Label Generation Rules](#) (March 2022)
- [Proposal for Latin Script Root Zone Label Generation Rules](#) (November 2021)
- [Proposal for Japanese Script Root Zone Label Generation Rules](#) (November 2021)
- [Additional Reference Label Generation Rulesets \(LGRs\) for the Second Level](#) (March 2021)
- [Guidelines for Developing Reference Label Generation Rules \(LGRs\) for the Second Level Version 2](#) (May 2020)

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<sup>1</sup> This is a copy of the text submitted via the ICANN Public comment platform.

<sup>2</sup> Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.

## Registries Stakeholder Group Comment

### 1. Overall, do the Reference LGRs meet their goal of defining Internationalized Domain Name (IDN) labels for the language or script that are suitable for the second level?

Yes

No

#### If no, please explain why.

Yes. The RySG says yes to support the process that creates the LGRs, not because we are evaluating the accuracy or efficacy of any specific LGR. An important part of the process is the use of subject matter experts, individuals who are proficient with a specific script and corresponding language. We appreciate that ICANN explicitly seeks such experts and engages with them to ensure that production of reference LGRs is made with a certain level of quality.

### 2. In your view, are there any technical changes required for any specific Reference LGRs? Please list the script or language LGR with the changes needed, reasoning why.

The Latin Script reference LGR introduces a sequence composed of three code points 006c 00b7 006c to represent Ela Geminada used in the Catalan orthography. Fundacio PuntCAT registry (.CAT) also offers such code point sequence as part of its [Catalan Language IDN Table](#) since 2006. Other registries, such as .EUS, .GAL and .MADRID use .CAT's registry implementation of Ela Geminada. As far as variant rules, ICANN's proposed LGR defines a variant relationship between the sequences '006c 00b7 006c' and '006c 006c', whereas .CAT variant rule defines the relationship between the sequences '006c 00b7 006c' and '006c 002d 006c'.

As a stakeholder group we don't advocate for any specific implementation. Provided IDN tables comply with current IETF standards and ICANN IDN guidelines (per our registry agreements), we stand by our long standing position that registry operators can have different design choices to meet their customer needs. That being said, we would like to understand whether ICANN's design choice is going to adversely affect the existing approved tables or the existing second level registrations.

### 3. Do you have any additional observations or suggested changes?

None related to the tables being reviewed. More generally, please continue to expand the portfolio of accepted scripts and languages.

#### *Summary of Submission:*

*The RySG supports the process that creates the LGRs .*

*The RySG would like to understand whether ICANN's design choice is going to adversely affect the existing approved tables or the existing second level registrations.*