Registries Stakeholder Group Statement

Phase 1 Initial Report on the Internationalized Domain Names EPDP

Date statement submitted[1]:   19 June 2023

Reference url:

https://www.icann.org/en/public-comment/proceeding/phase-1-initial-report-on-the-internationalized-domain-names-epdp-24-04-2023

Background[2]

The EPDP Team is seeking input on its sixty-eight (68) preliminary recommendations, which focus on Phase 1 questions included in the EPDP Team's charter on the following topics:

- Topic A: Consistent definition and technical utilization of the Root Zone Label Generation Rules (RZ-LGR)
- Topic B: "Same entity" at the top-level
- Topic D: Adjustments in registry agreement, registry service, registry transition process, and other processes/procedures related to the domain name lifecycle
- Topic E: Adjustments to string similarity review, objection process, string contention resolution, reserved strings, and other policies and procedures

Documents

- **Phase 1 Initial Report on the Internationalized Domain Names Expedited Policy Development Process (pdf, 3.68 MB)**

- **Recording & slide deck of the EPDP Team webinar (17 May)**

Related RySG comments

- **RySG feedback on the IDNs EPDP Request for Early Input** (10 November 2021)

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[1] This is a copy of the text submitted via the ICANN Public comment platform.

[2] 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

(copy of the comment submitted via the public comment platform)

Section 1: Information about Submission

Please provide your name: Registries Stakeholder Group (RySG)

Please provide your email address: publiccomments@rysg.info

Are you providing input on behalf of a group (e.g., ICANN community group, organization, company, government)? Yes

If yes, please explain   Registries Stakeholder Group (RySG)

Section 2: Preliminary Recommendation(s) on RZ-LGR as Sole Source

Preliminary Recommendation 1.1:
Please refer to page 27 of the Initial Report.

Preliminary Recommendation 1.1: The RZ-LGR must be the sole source to calculate the variant labels and disposition values for existing delegated gTLDs from the 2012 round.

Please indicate your response to Preliminary Recommendation 1.1:
Support Recommendation as written

Section 3: Preliminary Recommendation(s) on Same Entity Principle

Preliminary Recommendation 2.1:
Please refer to page 28 of the Initial Report.

Preliminary Recommendation 2.1: Any allocatable variant label of an existing IDN gTLD from the 2012 round, as calculated by the RZ-LGR, can only be allocated to the registry operator of the existing IDN gTLD or withheld for possible allocation only to that registry operator.

Please indicate your response to Preliminary Recommendation 2.1:
Support Recommendation intent with wording change

If you support the intent of Preliminary Recommendation 2.1 but think it requires a wording change, please provide your revised wording and reason here.

Any allocatable variant label of an existing ~~IDN~~ gTLD ~~from the 2012 round~~, as calculated by the RZ-LGR, can only be allocated to the same registry operator ~~of the existing IDN gTLD~~ or withheld for possible allocation only to that registry operator.

Section 4: Preliminary Recommendation(s) on Application Submission, Administrative Check, Initial Evaluation

Preliminary Recommendation 3.1:
Please refer to page 29 of the Initial Report.

Preliminary Recommendation 3.1: An application for an allocatable variant label cannot precede an application for that variant label's primary IDN gTLD string.

Please indicate your response to Preliminary Recommendation 3.1:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.2:
Please refer to pages 29–30 of the Initial Report.

Preliminary Recommendation 3.2: A future registry operator who wishes to apply for an allocatable variant label of its delegated IDN gTLD must submit an application during an application round.

Please indicate your response to Preliminary Recommendation 3.2:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.3:
Please refer to pages 30, 33–34 of the Initial Report.

Preliminary Recommendation 3.3: Applications for allocatable variant labels of existing IDN gTLDs from the 2012 round can be submitted during the immediate next application round of the New gTLD Program and any subsequent rounds.

Please indicate your response to Preliminary Recommendation 3.3:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.4:
Please refer to pages 31, 34 of the Initial Report.

Preliminary Recommendation 3.4: A future IDN gTLD applicant must be required to submit one application covering the primary IDN gTLD string and corresponding allocatable variant label(s) sought by the applicant.

Please indicate your response to Preliminary Recommendation 3.4:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.5:
Please refer to pages 31, 34 of the Initial Report.

Preliminary Recommendation 3.5: A future IDN gTLD applicant must be required, as part of the application process, to explain why it seeks one or more allocatable variant label(s) of its applied-for primary IDN gTLD

string. The same requirement applies to existing registry operators from the 2012 round who wish to apply for allocatable variant label(s) of their existing IDN gTLDs.

Please indicate your response to Preliminary Recommendation 3.5:
<mark>Support Recommendation intent with wording change</mark>

If you support the intent of Preliminary Recommendation 3.5 but think it requires a wording change, please provide your revised wording and reason here.

<mark>A future IDN gTLD applicant must be required, as part of the application process, to explain why it seeks one or more allocatable variant label(s) of its applied-for primary IDN gTLD string. The same requirement applies to existing registry operators ~~from the 2012 round~~ who wish to apply for allocatable variant label(s) of their existing IDN gTLDs.</mark>

Implementation Guidance 3.6:
Please refer to pages 31, 34 of the Initial Report.

Implementation Guidance 3.6: Criteria for evaluating the explanations submitted by applicants on the need for variant label(s) should be pre-identified and applied consistently by evaluators with the requisite expertise.

Please indicate your response to Implementation Guidance 3.6:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.7:
Please refer to pages 31, 34–35 of the Initial Report.

Preliminary Recommendation 3.7: A future IDN gTLD applicant must be required to demonstrate its ability to manage the applied-for primary IDN gTLD string and applied-for allocatable variant label(s) from both a technical and operational perspective. The same requirement applies to existing registry operators from the 2012 round who wish to apply for allocatable variant label(s) of their existing IDN gTLDs.

Please indicate your response to Preliminary Recommendation 3.7:
<mark>Support Recommendation intent with wording change</mark>

If you support the intent of Preliminary Recommendation 3.7 but think it requires a wording change, please provide your revised wording and reason here.

<mark>A future IDN gTLD applicant must be required to demonstrate its ability to manage the applied-for primary IDN gTLD string and applied-for allocatable variant label(s) from both a technical and operational perspective. The same requirement applies to existing registry operators ~~from the 2012 round~~ who wish to apply for allocatable variant label(s) of their existing IDN gTLDs.</mark>

Implementation Guidance 3.8:
Please refer to pages 31, 34–35 of the Initial Report.

Implementation Guidance 3.8: The evaluation of capability to manage the variant label set should be closely tied to the overall technical capability evaluation. The evaluation should be based on measurable criteria including, but not limited to, the performance of Critical Functions with respect to second-level registrations under the primary IDN gTLD string and the applied-for allocatable variant label(s).

Please indicate your response to Implementation Guidance 3.8:
Support Recommendation as written

Implementation Guidance 3.9:
Please refer to pages 31, 34–35 of the Initial Report.

Implementation Guidance 3.9: ICANN org may conduct research that helps identify additional standards or tests that should be used to evaluate the technical and operational capability to manage the variant label set.

Please indicate your response to Implementation Guidance 3.9:
Support Recommendation intent with wording change

If you support the intent of Implementation Guidance 3.9 but think it requires a wording change, please provide your revised wording and reason here.

Implementation Guidance 3.9: ICANN org may conduct research that helps identify **widely acceptable practices** that **may** be used to evaluate the technical and operational capability to manage **a** variant label set **at the registry level**.

Are there any comments or issues you would like to raise pertaining to the Rationale for Implementation Guidance 3.9? If yes, please provide your comments here.

The scope and scale at which the IDN EPDP will enable variant domain names is unprecedented (i.e. variants at the top-level). There is limited experience in this space, with the notable example of NGO/ONG technical bundle. While conducting research to identify acceptable practices is a good idea, we believe it is premature to think that "standards" can be identified at an early stage..

Preliminary Recommendation 3.10:
Please refer to pages 31, 35 of the Initial Report.

Preliminary Recommendation 3.10: The fee structure associated with future IDN gTLD applications that include variant label(s), as well as applications for variant label(s) of existing IDN gTLDs from existing registry operators from the 2012 round, must be consistent with the principle of cost recovery reflected in the 2012 Applicant Guidebook and affirmed by the New gTLD Subsequent Procedures PDP.

Please indicate your response to Preliminary Recommendation 3.10:
Support Recommendation intent with wording change

If you support the intent of Preliminary Recommendation 3.10 but think it requires a wording change, please provide your revised wording and reason here.

The fee structure associated with future IDN gTLD applications that include variant label(s), as well as applications for variant label(s) of existing IDN gTLDs from existing registry operators ~~from the 2012 round~~, must be consistent with the principle of cost recovery reflected in the 2012 Applicant Guidebook and affirmed by the New gTLD Subsequent Procedures PDP.

Preliminary Recommendation 3.11:
Please refer to pages 32, 35-37 of the Initial Report.

Preliminary Recommendation 3.11: A future IDN gTLD applicant applying for a primary IDN gTLD string and up to four (4) of that string's allocatable variant labels during an application round must incur the same base application fee as any gTLD applicant who does not apply for variant labels in that round.

Please indicate your response to Preliminary Recommendation 3.11:
Support Recommendation as written

Preliminary Recommendation 3.12:
Please refer to pages 32, 35–37 of the Initial Report.

Preliminary Recommendation 3.12: Any applicant applying for more than four (4) allocatable variant labels of a primary IDN gTLD string in an application round may incur additional fees that ICANN org considers to be proportionate to any additional costs associated with evaluating the application and consistent with the cost recovery principle.

Please indicate your response to Preliminary Recommendation 3.12:
Support Recommendation as written

Preliminary Recommendation 3.13:
Please refer to pages 32, 35–37 of the Initial Report.

Preliminary Recommendation 3.13: A future registry operator applying only for allocatable variant label(s) of its delegated primary IDN gTLD must incur a discounted base application fee that ICANN org considers to be proportionate to any costs associated with evaluating the application and consistent with the cost recovery principle.

Please indicate your response to Preliminary Recommendation 3.13:
Support Recommendation as written

Preliminary Recommendation 3.14:
Please refer to pages 32, 35–37 of the Initial Report.

Preliminary Recommendation 3.14: If an existing registry operator from the 2012 round applies for up to four (4) allocatable variant labels of its existing IDN gTLD:
• in the immediate next application round, the base application fee will be waived for that application as a one-time exception; or

• in any application round subsequent to the immediate next application round, that application must incur a discounted base application fee as set out in Preliminary Recommendation 3.13.

If an existing registry operator from the 2012 round applies for more than four (4) allocatable variant labels of its existing IDN gTLD:

• in the immediate next application round, that application may incur additional fees as set out in Preliminary Recommendation 3.12; or

• in any application round subsequent to the immediate next application round, that application must incur a discounted base application fee as set out in Preliminary Recommendation 3.13 AND may incur additional fees as set out in Preliminary Recommendation 3.12.

Please indicate your response to Preliminary Recommendation 3.14:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.15:
Please refer to pages 32, 37–38 of the Initial Report.

Preliminary Recommendation 3.15: As a one-time exception for the immediate next application round, applications for allocatable variant labels of existing IDN gTLDs from the 2012 round must receive priority in processing order ahead of all other new gTLD applicants, including the IDN applicants that elect to participate in the prioritization draw.

Please indicate your response to Preliminary Recommendation 3.15:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.16:
Please refer to pages 38–40 of the Initial Report.

Preliminary Recommendation 3.16: An applied-for allocatable variant label must be subject to the same application requirements and evaluation criteria as the associated primary IDN gTLD string. Specifically, the same documentation requirements apply to both the primary IDN gTLD string and its applied-for allocatable variant label(s). With respect to the three non-standard application types of gTLDs as identified by the SubPro PDP, this means that:

● An applicant for a Community-based TLD string and its allocatable variant label(s) is required to submit a written endorsement of its applied-for primary IDN gTLD string and applied-for allocatable variant label(s) from established institution(s) representing the community that the applicant has named.

● An applicant for a Geographic Name TLD string and its allocatable variant label(s) is required to submit a documentation of support or non-objection to its applied-for primary IDN gTLD string and applied-for allocatable variant label(s) from relevant governments or public authorities.

● An applicant for a .Brand TLD string and its allocatable variant label(s) is required to submit proof that its applied-for primary IDN gTLD string and applied-for allocatable variant label(s) are identical to registered trademarks owned and used by the registry operator or its affiliate.

Please indicate your response to Preliminary Recommendation 3.16:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.17:
Please refer to pages 40–42 of the Initial Report.

Preliminary Recommendation 3.17: The EPDP Team affirmed the Recommendation 25.4 in the SubPro PDP Final Report that single-character gTLDs may only be allowed for limited scripts and languages where a character is an ideograph. At the time of the EPDP Team's deliberations, the only script that meets the criteria is the Han script, which is used in the Chinese, Japanese, and Korean languages. Nevertheless, applications for single-character gTLDs that are ideographs must not be accepted until relevant guidelines from the Chinese, Japanese, and Korean Generation Panels are developed, finalized after Public Comment, and implemented in the New gTLD Program.

Please indicate your response to Preliminary Recommendation 3.17:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.18:
Please refer to pages 43–44 of the Initial Report.

Preliminary Recommendation 3.18: The Reserved Names list must not be expanded to include variant labels.

Please indicate your response to Preliminary Recommendation 3.18:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.19:
Please refer to pages 43–44 of the Initial Report.

Preliminary Recommendation 3.19: No application for a variant label of a Reserved Name is allowed.

Please indicate your response to Preliminary Recommendation 3.19:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.20:
Please refer to pages 43–45 of the Initial Report.

Preliminary Recommendation 3.20: The list of Strings Ineligible for Delegation must not be expanded to include variant labels.

Please indicate your response to Preliminary Recommendation 3.20:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.21:
Please refer to pages 43, 45 of the Initial Report.

Preliminary Recommendation 3.21: Only the protected organizations on the list of Strings Ineligible for Delegation are allowed to apply for the allocatable variant label(s) of their protected string(s) at the top-level. Consistent with Preliminary Recommendation 3.1, an application for an allocatable variant label of a protected

string cannot precede an application for the protected string, which serves as the primary label for generating the variant label.

Please indicate your response to Preliminary Recommendation 3.21:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 3.22:
Please refer to pages 46–48 of the Initial Report.

Preliminary Recommendation 3.22: Only an applied-for gTLD string that conforms to the mandatory string requirements, including IDNA 2008 for IDN strings, as well as the RZ-LGR, can be submitted through the new gTLD application submission system.
Where the initial algorithmic check deems an applied-for gTLD string as "invalid" or "blocked" (where the applied-for string is a variant label), such application for a non-conforming string may be accepted but the applicant must be warned of its potential disqualification.
If the DNS Stability Panel (DSP) subsequently confirms the applied-for string as "invalid" or "blocked" per the RZ-LGR and disqualifies the application for the non-conforming string, the applicant may invoke the limited challenge mechanism for DNS Stability Review, as recommended by the SubPro PDP, to seek a reassessment of the disqualification.
However, the applicant's ground to challenge is limited to a belief that its applied-for gTLD string is valid and allocatable as per the RZ-LGR and that the disqualification by the DSP was due to an incorrect assessment of the technical implementation of the RZ-LGR.

Please indicate your response to Preliminary Recommendation 3.22:
<mark>Support Recommendation as written</mark>

Section 8: Preliminary Recommendation(s) on Contractual Requirements

Preliminary Recommendation 7.1:
Please refer to pages 68–69 of the Initial Report.

Preliminary Recommendation 7.1: Any future IDN gTLD along with its variant labels (if any) must be subject to one Registry Agreement.

Please indicate your response to Preliminary Recommendation 7.1:
<mark>Support Recommendation intent with wording change</mark>

If you support the intent of Preliminary Recommendation 7.1 but think it requires a wording change, please provide your revised wording and reason here.

<mark>Understanding the intent of this recommendation is to ensure the integrity of the variant set and treat all variant labels of a primary IDN gTLD the same, we suggest amending to read "Any future IDN gTLD along with its variant labels (if any) must be subject to one Registry Agreement **with substantially similar SLAs and other operational requirements for each variant label.**"</mark>

Implementation Guidance 7.2:
Please refer to pages 68–69 of the Initial Report.

Implementation Guidance 7.2: A new specification or an amendment to the base Registry Agreement for any future IDN gTLD along with its variant label(s) may need to be developed to incorporate variant management provisions.

Please indicate your response to Implementation Guidance 7.2:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.3:
Please refer to pages 68–69 of the Initial Report.

Preliminary Recommendation 7.3: Any existing IDN gTLD registry operator from the 2012 round that applies for its variant labels in the future must be required to enter into a separate, new Registry Agreement for the newly approved variant label(s), while maintaining the existing Registry Agreement for its existing IDN gTLD.

Please indicate your response to Preliminary Recommendation 7.3:
<mark>Support Recommendation as written</mark>

Implementation Guidance 7.4:
Please refer to pages 68–69 of the Initial Report.

Implementation Guidance 7.4: It is expected that the separate, new Registry Agreement for the newly approved variant labels will be linked in some way to the Registry Agreement for the existing IDN gTLD from the 2012 round.

Please indicate your response to Implementation Guidance 7.4:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.7:
Please refer to pages 71–72 of the Initial Report.

Preliminary Recommendation 7.7: The registry service provider for each one of the Critical Functions as defined in the Base Registry Agreement for an existing IDN gTLD from the 2012 round must be the same as for its delegated variant labels. The Critical Functions are: DNS Service, DNSSEC proper resolution, EPP, RDDS, and Data Escrow.

Please indicate your response to Preliminary Recommendation 7.7:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.8:
Please refer to pages 71–72 of the Initial Report.

Preliminary Recommendation 7.8: If the registry operator of an IDN gTLD changes its back-end registry service provider, that IDN gTLD and any delegated variant label(s) associated with that IDN gTLD must simultaneously transition to the new back-end registry service provider.

Please indicate your response to Preliminary Recommendation 7.8:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.9:
Please refer to page 73 of the Initial Report.

Preliminary Recommendation 7.9: In the event a Registry Transition or Change of Control process is initiated for an IDN gTLD, the process must encompass the IDN gTLD and all its allocated and delegated variant label(s), if any, at the same time.

Please indicate your response to Preliminary Recommendation 7.9:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.13:
Please refer to page 74 of the Initial Report.

Preliminary Recommendation 7.13: The same data escrow provider must be contracted for the IDN gTLD and its allocated and delegated variant label(s).

Please indicate your response to Preliminary Recommendation 7.13:
<mark>Support Recommendation as written</mark>

Implementation Guidance 7.14:
Please refer to page 74 of the Initial Report.

Implementation Guidance 7.14: The escrow data associated with each gTLD variant label should be stored in separate files.

Please indicate your response to Implementation Guidance 7.14:
<mark>Support Recommendation as written</mark>

Preliminary Recommendation 7.15:
Please refer to pages 74–75 of the Initial Report.

Preliminary Recommendation 7.15: The applied-for primary IDN gTLD string and any allocatable variant label sought by the applicant must be bound by the same restrictions, which will become contractual requirements upon execution of the Registry Agreement. Similarly, any allocatable variant label sought by an existing IDN gTLD registry operator from the 2012 round will be bound by the same restrictions as the existing IDN gTLD

upon execution of the corresponding new Registry Agreement for the newly approved variant label(s). The restrictions in this recommendation refer to the differential treatment and requirements applied to non-standard types of gTLDs, which are Community-based TLDs, Brand TLDs, Geographic Name TLDs, as well as TLDs subject to Category 1 Safeguards.

Please indicate your response to Preliminary Recommendation 7.15:
<mark>Support Recommendation as written</mark>

Section 9: Preliminary Recommendation(s) on Delegation and Removal

Preliminary Recommendation 8.2:
Please refer to pages 76–78 of the Initial Report.

Preliminary Recommendation 8.2: In order to encourage a positive and predictable registrant experience, a framework for developing guidelines for the management of gTLDs and their variant labels at the top-level by registries and registrars must be created during implementation.

Please indicate your response to Preliminary Recommendation 8.2:
<mark>Support Recommendation intent with wording change</mark>

If you support the intent of Preliminary Recommendation 8.2 but think it requires a wording change, please provide your revised wording and reason here.

<mark>Preliminary Recommendation 8.2: In order to encourage a positive and predictable registrant experience, a framework for developing non-binding guidelines for the management of gTLDs and their variant labels at the top-level by registries and registrars must be created during implementation.</mark>

Implementation Guidance 8.3:
Please refer to pages 76–78 of the Initial Report.

Implementation Guidance 8.3: The framework should outline the scope and the steps involved in developing future guidelines, which at a minimum should involve relevant stakeholders, such as registries, registrars, and where feasible, registrants who have experience with IDNs and variant labels.

Please indicate your response to Implementation Guidance 8.3:
<mark>Support Recommendation intent with wording change</mark>

If you support the intent of Implementation Guidance 8.3 but think it requires a wording change, please provide your revised wording and reason here.

<mark>Implementation Guidance 8.3: The framework should outline the scope and the steps involved in developing future non-binding guidelines, which at a minimum should involve relevant stakeholders, such as registries, registrars, and where feasible, registrants who have experience with IDNs and variant labels.</mark>

Preliminary Recommendation 8.6:
Please refer to pages 80–82 of the Initial Report.

Preliminary Recommendation 8.6: Any delegated gTLDs and their delegated and allocated variant labels (if any) not validated by a proposed RZ-LGR update must be grandfathered. In other words, the proposed update will apply to future new gTLDs and their variant labels and will not be retrospective; there will be no change to the contractual and delegation state of the delegated gTLDs and their delegated and allocated variant labels (if any), which predate the proposed RZ-LGR update and are subject to the version of RZ-LGR when those gTLDs and variant labels were initially applied for upon the finalization of the application process.

Please indicate your response to Preliminary Recommendation 8.6:
Support Recommendation as written

Preliminary Recommendation 8.10:
Please refer to pages 83–84 of the Initial Report.

Preliminary Recommendation 8.10: A primary IDN gTLD that is removed from the root zone, either voluntarily or involuntarily, must also require the removal of its delegated variant label(s) from the root zone.

Please indicate your response to Preliminary Recommendation 8.10:
Support Recommendation as written

Preliminary Recommendation 8.11:
Please refer to page 84 of the Initial Report.

Preliminary Recommendation 8.11: A delegated variant label that is voluntarily removed from the root zone will not require the removal of the associated primary IDN gTLD or its other delegated variant label(s).

Please indicate your response to Preliminary Recommendation 8.11:
Support Recommendation as written

Preliminary Recommendation 8.12:
Please refer to page 84 of the Initial Report.

Preliminary Recommendation 8.12: In the event that a label is removed from the root zone as a consequence of its registry operator's breach of the Registry Agreement, its associated variant label set must also be removed from the root zone.

Please indicate your response to Preliminary Recommendation 8.12:
Support Recommendation as written

Other Comments and Submission

Are there any other comments or issues you would like to raise pertaining to the Initial Report? If yes, please provide your comments here. If applicable, please specify the section or page number in the Initial Report to which your comments refer.

For clarity and consistency, we suggest a **global change to the usage of the phrase "IDN gTLD registry operators of the 2012 round"** to simply gTLDs to ensure there is no confusion that this is applicable to all existing gTLDs and not only those established out of the 2012 application round. This global change would apply **everywhere except for recommendations 3.14 and 3.15 where it would change the intent of the recommendation**.

This is especially important to ensure clarity where the recommendations establish rights of existing registry operators of existing gTLDs the rights to the associated IDN variants. Even if the existing operator does not apply, those rights remain.

Summary of Submission*:

The Registries Stakeholder Group (RySG) provided feedback on selected recommendations of the Phase 1 Initial Report on the Internationalized Domain Names EPDP.