

The Registries Stakeholder Group (RySG) appreciates that ICANN incorporated feedback from the stakeholder group in creating the process for evaluating deviations from the Reference Second Level LGRs, however we note that the proposed process remains overly restrictive and makes the reference LGRs de facto requirements for future IDN implementations. While we agree that language communities should work together to create LGRs to minimize the chance of user confusion or security stability issues, it remains our view that ICANN's reference LGRs should serve, as their name makes clear, as references for registries and other implementers of IDNs. The reference LGRs should not limit the range of implementation options for gTLD registries unless clear issues of security and stability are identified. Further, we do not believe that there is any contractual basis for ICANN to approve or deny changes to IDN tables where a registry provider is already authorized to offer IDNs in a specific language/script.

We therefore make the following suggestions to improve the process:

- Deviation from reference LGRs should not require justification by registries, and the process does not need to encourage them; ICANN should proceed with its normal validation routines for the requested deviation, and consult with the registry operator to determine the rationale for such deviations. ICANN (and not the registry) should be responsible to point out security and stability issues, as part of such consultations.
- Following from the above principle, the only basis for ICANN to consider a submission from a registry operator to be incomplete is if the proposed IDN table is not well formed.
- The current process contemplates that ICANN would consider IDN implementations that include only a subset of the core codepoints of a given language/script to be deviations from the reference LGRs. The RySG is unaware of any situation in which having a smaller number of codepoints would represent any security or stability risk; we therefore believe that it is unnecessary for ICANN to evaluate tables that are purely a subset of the reference LGRs.
- In cases where a registry operator has already been approved to offer IDNs in a specific language/script, ICANN does not have a contractual basis to reject changes to the relevant IDN tables.<sup>1</sup> As such, concerns identified as part of this process should be considered to be advisory only.

We thank ICANN for working with the community to create the reference LGRs. The suggestions above create a model that is both advantageous for internet users as well as consistent with ICANN's Registry agreements. An advisory role for ICANN better shares responsibility between ICANN and their Registry partners. It also allows ICANN to scale its language expertise across Registries. We believe the definitions above will help foster healthy competition between Registries and safeguard the security and stability of the internet for its users.

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<sup>1</sup> Section 1.4 of Specification 6 requires that "Registry Operator shall publish and keep updated its IDN Tables and IDN Registration Rules in the IANA Repository of IDN Practices as specified in the ICANN IDN Guidelines" but does not provide that ICANN approves such updates.