

**Comments of the Registries Constituency
String Length Requirement for IDN TLDs
January 7, 2009**

The Registries Constituency of the GNSO (RyC) appreciates the opportunity to provide these Comments on the String Length Requirement for IDN TLDs. The comments that follow represent a consensus position of the RyC as further detailed at the end of the document.

Section 2.1.1.3.2 String Requirement, sub-section "Policy Requirements for Generic Top-Level Domains" (Module 2, page 2-8) of the draft "New gTLD Applicant Guidebook" (the Guidebook) currently states that:

“Applied-for strings must be composed of three or more visually distinct letters or characters in the script, as appropriate.”

Members of the GNSO Registries Constituency had participated actively at the GNSO IDN WG as well as the GNSO Reserved Names WG in the new gTLD process. Through these processes, the issue of the length requirement of new IDN gTLDs has also been discussed at length.

We refer to the GNSO Final Report suggesting that:

“[For Single and Two Character IDN strings at all levels,] Single and two-character U-labels on the top level and second level of a domain name should not be restricted in general. At the top level, requested strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language used in order to determine whether the string should be granted for allocation in the DNS.”

We understand that the limitation to 3 or more characters would be a substantial deterrent for the adoption of IDN TLDs especially for regions such as North East Asia. For example, ".å®¶" (Chinese), ".ã«ãf<" (Japanese), ".ê±´ê°•" (Korean) would be useful generic TLD strings for the respective communities. We therefore respectfully suggest that ICANN uphold the policy recommendation by the GNSO on this regard by removing the paragraph quoted above from the Guidebook.

RyC Information with regard to These Comments

A supermajority of 10 RyC members supported this statement:

- Total # of eligible RyC Members¹: 15
- Total # of RyC Members: 15

¹ All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the “effective date” set forth in the operator’s or sponsor’s agreement (Article III, Membership, ¶ 1). The RyC Articles of Operations can be found at http://www.gtldregistries.org/about_us/articles .

- Total # of Active RyC Members²: 15
- Minimum requirement for supermajority of Active Members: 10
- Minimum requirement for majority of Active Members: 8
- # of Members that participated in this process: 14
- Names of Members that participated in this process:

1. Afilias (.info)
2. DotAsia Organisation (.asia)
3. Dot Cooperation LLC (.coop)
4. Employ Media (.jobs)
5. Fundació puntCAT (.cat)
6. Global Name Registry - GNR (.name)
7. mTLD Top Level Domain (.mobi)
8. Museum Domain Management Association – MuseDoma (.museum)
9. NeuStar (.biz)
10. Public Interest Registry - PIR (.org)
11. RegistryPro (.pro)
12. Societe Internationale de Telecommunication Aeronautiques – SITA (.aero)
13. Tralliance Corporation (.travel)
14. VeriSign (.com & .net)

² Per the RyC Articles of Operations, Article III, Membership, ¶ 4: Members shall be classified as “Active” or “Inactive”. A member shall be classified as “Active” unless it is classified as “Inactive” pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in a Constituency meeting or voting process for a total of three consecutive meetings or voting processes or both, or by failing to participate in meetings or voting processes, or both, for six weeks, whichever is shorter. An Inactive member shall have all rights and duties of membership other than being counted as present or absent in the determination of a quorum. An Inactive member may resume Active status at any time by participating in a Constituency meeting or by voting.