

## Registries Stakeholder Group Statement

Issue: **Internationalized Domain Name (IDN) Implementation Guidelines (2nd public comment)**

Date statement submitted: **10 December , 2017**

Reference URL: <https://www.icann.org/public-comments/idn-guidelines-2017-10-19-en>

### Background

- Implementation guidelines for IDN registrations on the second level.
- The IDN Implementation Guidelines aim to minimize the risk of cybersquatting and consumer confusion.
- The GNSO asked ICANN to review the [current guidelines](#), which were last updated in 2011.
- The IDN Guidelines are applicable to all TLD registries that offer IDN registrations under their Registry Agreement and intend to serve as best current practice examples for ccTLD registries and registrars offering IDNs.
  
- The RySG commented on the previous version (3 March 2017) of the draft guidelines:  
<http://mm.icann.org/pipermail/comments-idn-guidelines-03mar17/attachments/20170502/fdf29d62/RySGcomment-IDNImplementationguidelines-final2May-0001.pdf>
  
- Input is explicitly requested on:
  - the clarified scope of the guidelines (section 1.2)
  - Reasonable timeline to implement guideline 6(a) use of LGR format for IDN Tables

### Registries Stakeholder Group (RySG) comment:

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the Draft Guidelines for the Implementation of Internationalized Domain Names, version 4.0. The RySG is pleased to see that several of its comments on the previous version of the draft guidelines have been taken into account.

Draft Guideline 8 (formerly Guideline 9) states that IDN Tables that pose “any security and/or stability issues must not be implemented”, however the Guidelines fail to define what constitutes a security and/or stability issue and who decides whether a Table does, in fact, pose any issues. The RySG reiterates its earlier comment on this issue: In the context of these IDN Guidelines, the RySG is of the opinion that “security and/or stability issues” is too broad and too open for interpretation. The relevant standards by which stability is assessed should only be Standards-Track or Best Current Practice RFCs sponsored by the IETF.

Noting that Draft Guideline 11 (formerly Guideline 12) still lacks a definition of “same registrant”, we recommend that Guideline 12 should include language stating that where a variant is active it should be delegated to the same name servers as the primary label.

The RySG agrees with the IDN Implementation Guidelines Working Group on the clarified scope of the guidelines in Section 1.2, these Guidelines should only apply to domain names at the second, or lower levels, registered with the corresponding TLD registry.

On the Reasonable timeline to implement guideline 6(a) on the use of the LGR format for IDN Tables the RySG is of the opinion that, consistent with our comments on the March 2017 document, registries should not be required to implement RFC 7940 to publish IDN Tables. Registries who desire to transition to the new format should do it at their discretion.

The RySG recommends providing registry operators with a transitional period, during which ICANN will not enforce these Guidelines and registries can assess, review and update their policies (internal and external) to conform to the new Guidelines, especially with respect to Guidelines 11, 12, 13, 18 and 19. Such transition period should not be less than 18 months from the adoption of these Guidelines.

The RySG proposes the following additions to the definitions in Appendix B:

- Blocked (addition suggested to avoid confusion)  
*‘State of an IDN label after blocking.  
The resulting string is a valid label, **generated based on a given LGR (or IDN Table and IDN registration rules)**, but should be blocked from registration. (...)’*
  - Whole Label Evaluation Rules (missing words in the definition)  
*‘Context-based and whole label rules. The **“rule” element** also contain the character classes that they depend on, and (...)’*
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