ICANN | ccNSO

Completion development phase ccPDP4 on the (de-)selection of IDNccTLD String and variants

Date: 27 February 2024

To: Nicolás Caballero, Chair of the Governmental Advisory Committee

Dear Nicolás

As required under section 10.a of Annex B of the ICANN Bylaws I am writing to invite the GAC to offer its opinion or advice on the proposed policy for the (de-)selection of IDNccTLD String and variants. If adopted, this policy will replace the Fast Track Process for the selection of IDNccTLD, which was developed in a joint ccNSO-GAC effort in 2007-2008, and became operational in November 2009.

I am pleased to inform you that the Issue Manager of ccNSO Policy Development Process 4 on the policy for the (de-)selection of IDNccTLD String and variants has submitted the Final Report to the ccNSO Council on 23 February 2024. Part A of this report includes the recommended policy as developed by the working group.

I want to use this opportunity to draw attention to a session during ICANN79 on Tuesday 5 March 2024|block 5, when the leadership of the ccPDP4 Working Group will provide a final overview of the policy to inform the community deliberations. The leadership of the working group will also organize a webinar on 21 March, to inform the ccNSO membership in preparation of their voting in support of the policy.

For your information, the ccNSO Council intends to discuss the policy recommendations at its upcoming meeting on 7 March during ICANN79. The ccNSO members vote is expected to start on 27 March and will remain open until 17 April 2024.

If you have any questions regarding this letter or the matter at hand, please do not hesitate to reach out.

Kind regards,
Alejandra Reynoso
Chair of the ccNSO Council

Final Report ccNSO PDP4 (de-)selection of IDNccTLDs

Proposals for the (de-)selection of IDNccTLD String and variants

country code Names Supporting Organization
Policy Development Process 4
Working Group

Final – 23 February 2024

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Part O – Introducing the Final Report and Policy Recommendations

Section 1 Executive Summary

In March 2020, the ccNSO Council initiated the fourth ccNSO Policy Development Process (ccPDP4) to develop policy for the (de-) selection and delegation, transfer, revocation & retirement of IDNccTLDs. The task was to address the issues identified by the ccNSO Preliminary Review Team with respect to the 2013 proposed policy for the selection of IDNccTLD strings, including but not limited to lack of definition of variant and variant management and the deselection of IDNccTLD strings i.e., retirement of IDNccTLDs.

In addressing the issues relating to variant and variant management through this PDP effort, and to achieve a consistent solution across IDN variant ccTLDs and IDN variant gTLDs as requested and suggested by the ICANN Board, the proposed policy builds on and includes the Variant TLD Recommendations developed by ICANN and as adopted by the Board. In addition, the ccPDP4 group coordinated its effort with the related GNSO IDN EPDP effort per Board request.

In July 2022, the ccPDP4 was additionally tasked by the ccNSO Council to look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii) (exclusion of the Independent Review Process and Reconsideration), and, if clarification is needed, make a recommendation to that effect. In addition, ccPDP4 was tasked to recommend whether the ccPDP3 Review Mechanism should apply, which was developed in parallel with the ccPDP4 effort.

The ccPDP4 recommended policy focuses on four (4) stages : (i) the selection of the IDNccTLD string and related variants; (ii) the validation of the selected IDNccTLD string and its variants; (iii) the delegation, transfer, and revocation of the IDNccTLD string and its variants and, the retirement of the IDNccTLD string and its variants, and finally, (iv) the potential review of specific decisions pertaining to the delegation, transfer, revocation and retirement of an IDNccTLD strings and its related variants.

The proposals do not intend to amend nor change current policies – for example RFC 1591 as interpreted by the Framework of Interpretation - for the delegation, transfer, revocation, and retirement of ccTLDs. Rather the goal is that the ccPDP4 recommendations build on these policies. In addition, and as tasked by the ccNSO Council, it is recommended that the proposed Review Mechanism policy applies to specific situation identified in the proposed policy. However, it is recognized that due to the nature of IDNccTLDs and variants additional, specific provisions had to be provided specifically for IDNccTLDs. These specific provisions may deviate from current policies. For example, an IDNccTLD string and its Delegatable variants must be delegated to one and the same entity i.e., the same (IDN)ccTLD manager.

Section 2 Reading Guide

Overview of the Report

This Report includes four (4) parts:

- Part O - Introducing the Final Report and Policy Recommendations
- Part A - The Policy Recommendations
- Part B- Advice to IDNccTLD Managers
- Part C - Annexes

Part O provides a general introduction and context to the policy recommendations and information about the policy development process itself.

In Part A the policy recommendations as developed through the ccNSO policy development process are presented and the adoption of these recommendations is subject to the decision-making procedures of the ccNSO policy development process, Annex B of the ICANN bylaws, sections 10 to 15.

In addition to the recommended policy the WG has developed advice for (IDN) ccTLD managers with respect to IDN Tables and registrations under IDNccTLD (variants). These suggestions are included in Part B of this report. For various reasons, including but not limited to the limitations in remit and scope of ccNSO Policy Development Processes as defined in Annex C of the ICANN Bylaws, they are not part of the proposed policy. However, the WG deemed these suggestions important and therefore included them as suggestions or advice to ccTLD Managers and related parties. As such the ccNSO Council will be requested to adopt and support the two (2) Advices, in accordance with and subject to the Internal rules of the ccNSO.

To inform the reader and provide additional background, Part C includes a series of Annexes. These Annexes are not part of the proposed policy but may provide color and depth to the proposals.

Overview per section

In part O – Section 3 below, the context and introduction of the proposed policy and advice is provided. In Section 4 below the process to date and the steps the Working Group went through in developing the proposed policy are recorded, and in section 5, the working group addresses the question whether all topics identified in the Issue Report, have been addressed.

To assist the reader to put the various parts of the proposed policy in context, the table below has been designed. The main areas are:

- Policy Objective, Applicability of the policy and Principles
- Selection of IDNccTLD strings and variants

- Validation of IDNccTLD string & Variants
- Delegation, Transfer, Revocation and Retirement of IDNccTLDs and Variants
- Review of Decisions

Overview sections in Part A relating to selection of IDNccTLDs and related variants and the delegation, transfer, revocation and retirement of IDNccTLDs & variants				
Sections 1 & 2	**Sections 2, 3 - 6**	**Sections 2, 7- 10**	**Sections 2, 11 - 12**	**Section 2 & 13**
Policy Objective, Overview, Applicability & Principles/Design Criteria Relation to ISO3166 ASCII and IDNccTLDs are ccTLDs Preserve stability, security, and interoperability of DNS Ongoing Process Criteria determine number of IDNccTLDs	Selection of IDNccTLD strings and Variants	Validation of IDNccTLD string & variants	Delegation, Transfer, Revocation, and Retirement IDNccTLDs and variants	Review of Decisions
	Parties in Territory	ICANN & Independent Panels	IDNccTLD Manager & ICANN, PTI (IFO)	IDNccTLD Manager & PTI (IFO) & Independent Panel
	General String selection criteria, Definition of variant, and variant management Technical, and confusing similarity criteria	Validation & Administrative Procedures	Applicability of general ccTLD policies and procedures Specific requirements for IDNccTLDs	Applicability cc Review Mechanism (under Board consideration) Exclusion IRP/ Reconsideration

In Part A - section 1 the objective and applicability of the recommended policy are provided, as well as the overarching principles or design criteria. These principles guide the development, implementation, and future interpretation of the proposed policy recommendations.

The recommended policy itself focuses on four (4) stages of the IDNccTLD life-cycle: (i) the selection of the IDNccTLD string and related variants; (ii) the validation of the selected IDNccTLD string and its variants; (iii) the delegation, transfer, and revocation of the IDNccTLD string and its variants and, finally; (iv) the retirement of the IDNccTLD string and its variants and potential review of specific decisions pertaining to the delegation, transfer, revocation and retirement of an IDNccTLD strings and its related variants.

A high-level overview of the policies that will apply to the four stages is provided, assuming the proposed policy is adopted and becomes effective. This starts with the proposed two-step process and criteria for the selection and validation of IDNccTLD strings and related variant IDNccTLDs strings. The details of the first step of the process - the selection of the IDNccTLD string and related variants - are provided in the sections on Criteria for the selection of IDNccTLD strings (Part A - section 3), Required Support for IDNccTLD string (Part A - section 4), Variant & Variant Management (Part A - section 5) and Technical and other string requirements (Part A - section 6).

The second step - the validation of the selected IDNccTLD string and its variants - is detailed in the sections on Validation Procedures (Part A - section 7), Publication of IDNccTLD string (Part A - section 8), Completion of IDNccTLD selection process (Part A - section 9), and the Change, withdrawal, or termination of the request (Part A - section 10).

The aspects of the delegation, transfer, and revocation of the IDNccTLD string and its variants are detailed in Part A - section 11.

The specific events and related procedures initiating the retirement of a delegated IDNccTLDs, and its delegated variants are described in part A - section 12.

As to the applicability of the review mechanism for decisions pertaining to IDNccTLDs and related variants, specific details are provided in Part A section 13.

The proposed policy is concluded with recommendations regarding some miscellaneous topics: (Part A - section 14 A) the need to keep information confidential during the validation step; (Part A - section 14 B) Transitional arrangement; (Part A - section 14 C) Review of the proposed policy, and (Part A - section 14 D) Verification of Implementation

Headings- Throughout this report, including Part A, sections and subsections include **headings**. These headings are not part of the recommendations and should not be interpreted as such. They are included to aid the reader.

Part A sections 1 to 14 also includes *Notes and Observations*. These Notes and Observations should not be considered to be part of the proposed policy recommendations. They are included to provide context to the recommendations and to assist in future interpretation of the policy as well as an understanding of the considerations of the Working Group if needed..

To avoid confusion the *Notes and Observations* are presented in this format.

Part B contains the advice to for (IDN) ccTLD managers the WG has developed. Part B section 1 provides the advice with respect to IDN Tables and section 2 the advice with respect to registrations of variants under IDNccTLD (variants).

In Part C a series of Annexes are included. These Annexes are not part of the proposed policy nor the advice to the ccTLD mangers, but may provide color and depth to the proposals.

The first two Annexes are glossaries: in Annex A specific terminology used in the policy proposal is recorded, and Annex B terminology derived from the ISO 3166 Standard is included.

As part of its work the working group tested the recommended policy by:

- Testing the process as developed by applying "corner case" situations to understand whether such a case results in an unwanted outcome or side effects.
- If the outcome of such a situation would result in an unwanted outcome or side effects adjust the proposals /process as needed.

`The working group used 33 of these situations and the results of the stress testing can be found in Annex C.

The WG published its Initial Report in August 2023, to seek public comments. The forum was closed in September 2023. The Summary and Analysis of the public comment is included in Annex D. The WG notes that as a result of the analyses the WG adjusted some of the initial proposals. Where considered relevant the rationale to amend the proposal is included in the Comments and Observations relating to the specific recommendation

As noted, the ICANN Board requested the working group to undertake its work in coordination with the GNS EPDP working group. The request was made to ensure a consistent solution, based on the Variant TLD Recommendations, for IDN variant ccTLDs and IDN variant gTLDs. In Annex E, a comparison with the EPDP initial results is provided.

Annex F includes the charter of the WG and in Annex G the Membership & Support of the WG is listed.

Finally, as part of the development of this policy the Working Group has created and used a wealth of background documentation which is not included in this document. Although not included, this material was very helpful in providing an understanding of the context and impact. The background material, including the presentations by the Working Group and to the Working Group can be found on the web page and wiki space of the Working Group[1].

[1] https://ccnso.icann.org/en/workinggroups/idn-cctld-strings.htm

Section 3 - Context and Introduction

3.1 Context

In 2007 the ccNSO membership, other ccTLD managers and ICANN's Governmental Advisory Committee (GAC) identified various policy issues relating to the introduction of Internationalized Domain Names country code Top Level Domains (hereafter: IDNccTLDs), which were submitted to the ICANN Board of Directors[2]. At the time it was clear that the development of a policy to resolve the issues identified relating to the introduction of IDNccTLDs in the DNS was likely to take at least 2 years. Also, it was clear that such a time frame was a major concern for countries, sub-divisions and other areas of geopolitical interest that had expressed a pressing need for an IDNccTLD. As a result, the concept of a fast-track approach emerged. In those discussions it was thought that it might be possible to find a method to allow the introduction of a limited number of IDNccTLDs while the overall policy was being developed.

At its meeting on 2 October 2007[3], the ccNSO Council requested an Issue Report to establish whether the ccNSO should launch a policy development process for the selection and delegation of IDNccTLD strings. In parallel to the launch of such an IDN ccPDP, the ccNSO Council, together with other ICANN supporting organizations and Advisory Committees, advised the ICANN Board to set-up an Internationalized Domain Name Working Group to develop a methodology for the introduction of a limited number of IDNccTLDs. This latter initiative resulted in the IDNccTLD Fast Track Process, which after implementation was launched on 16 November 2009[4] .

In April 2009, the ccNSO Council initiated the IDN ccPDP, and two working groups were appointed, each with its own charter, working method and schedule[5]:

- The purpose of the first working group (IDN ccPDP WG 1) was to study and report on a feasible overall policy for the selection and delegation of IDNccTLDs. The working group should consider and be guided by the joint GAC-ccNSO Issues Paper and comments received on that document, the Final Report of the IDNC Working Group and the associated Fast Track Implementation Plan and experience with and reviews of the Fast Track Process.
- The purpose of the second working group was to report on changes to the ICANN bylaws to include IDNccTLD managers in the ccNSO.

[2] http://www.icann.org/topics/idn/ccnso-gac-issues-report-on-idn-09jul07.pdf
[3] http://ccnso.icann.org/about/minutes/ccnso-council-call-02oct07.pdf
[4] http://www.icann.org/en/news/announcements/announcement-16nov09-en.htm
[5] http://ccnso.icann.org/workinggroups/minutes-council-07apr09.pdf

The IDN ccPDP WG 1 published its Final Paper including its recommendations for the overall policy in December 2012.[6] The IDN ccPDP WG 2 published its recommendations in its Final Paper in November 2012.[7] The recommendations have been integrated in the Interim and Final Report of the Issue Manager.

In September 2013 the ccNSO submitted the IDN country code policy development process (ccPDP 2) Board Report to the ICANN Board of Directors containing two sets of recommendations:

- Proposals (at a high level) for the criteria and requirements for the IDNccTLD string selection and activities, roles, and responsibilities of the actors involved in the string selection and string evaluation processes and procedures.
- Proposals to enable the inclusion of IDNccTLD in the ccNSO.

By mutual understanding, the ccNSO Council and the ICANN Board allowed the Fast Track Process to further inform the overall policy, specifically to test and gain experience with the policy aspects of the evolution of the procedures under the Fast Track process pertaining to potential confusing similarity of IDNccTLD [8]. The latest step in the evolution of the Fast Track Process was the introduction of the community developed Guideline regarding the Risk Mitigation Panel and related process.

In March 2019 the ccNSO Council tasked a team (Preliminary Review Team or PRT) to review ccPDP2 considering the impact of the following on the recommended policies:

- The evolved Fast Track Process,
- The request of the ICANN Board of Directors with respect to IDN Variants and
- Other relevant developments such as retirement of the (IDN)ccTLDs
- The Inclusion of IDNccTLD in the ccNSO.

The PRT was requested to advise the Council on whether to launch an additional Policy Development Process to address open issues, if any, or take other steps.

Based on its high-level analysis the PRT[9] identified various issues with the recommended policy for the selection of IDNccTLD strings and advised Council to launch a ccNSO Policy Development Process (ccPDP4) to address the various issues it had identified, including the deselection of IDNccTLD strings. With respect to the recommendations in ccPDP2 pertaining to the inclusion of IDNccTLD, the PRT did not identify any issues and therefore advised the ccNSO Council to request a change of Article 10 of the ICANN Bylaws and Annex B.

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[6] http://ccnso.icann.org/workinggroups/final-recommendations-idn-cctld-selection-21dec12-en.pdf
[7] http://ccnso.icann.org/node/35859
[8] See: https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf, general introduction page 4.
[9] https://ccnso.icann.org/sites/default/files/field-attached/final-report-idn-prt-29jul19-en.pdf

At its meeting 22 August 2019 meeting the ccNSO Council adopted the recommendations of the PRT. To implement these recommendations the ccNSO Council requested the ICANN Board of Directors to agree to take no additional steps with respect to ccPDP2 and stop the evolution of the Fast Track Process[10]. In October 2019 the ICANN Board confirmed and agreed with this approach[11].

Since March 2019, and following the initial discussions of the ccNSO Council, input and feedback was sought from the community at the Kobe (ICANN64), Marrakesh (ICANN65) & Montreal (ICANN66) meetings. The community present at these meetings concurred with the view that (IDN) ccPDP4, should be launched and focus should be limited to the items identified by the ccNSO Preliminary Review Team with respect to the (de-)selection of IDNccTLD strings and management of variants of selected IDNccTLD strings. The community also concurred and re-confirmed that the ccPDP2 recommendations to amend Article 10 and Annex B to allow the inclusion of IDNccTLD Managers in the ccNSO on equal footing.

3.2 Introduction

At its December 2019 meeting, and in accordance with Annex B section 1 of the ICANN Bylaws the ccNSO Council appointed the Issue Manager and requested an Issue Report, which should address the following topics:

- Whether or not the ccNSO should initiate the ccNSO Policy Development Process on the (de-)selection of IDNccTLD strings (ccPDP4) and other areas listed in the Final Report of the Preliminary Review Team and, with respect to the deselection be guided by and build-upon the process for the retirement of ccTLDs.
- Whether or not to convene a Taskforce or use other methods to address these issues.

In March 2020 the Issue Manager recommended that the ccNSO Council initiate ccNSO Policy Development Process 4 to develop policy for the (de-) selection and delegation, transfer, revocation, and retirement of IDNccTLDs.

Throughout this policy development process, the issues identified by the ccNSO Preliminary Review Team with respect to the (de-)selection of IDNccTLD strings and management of variants of selected IDNccTLD strings should be addressed.

In developing its policy and at the request of the ICANN Board of Directors[12], the Variant TLD Recommendations developed by ICANN and as adopted by the Board should be considered.

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[10] https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-chalaby-04sep19-en.pdf.
[11] https://www.icann.org/en/system/files/correspondence/chalaby-to-sataki-31oct19-en.pdf
[12] https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-14-03-2019-en#2.a

In addition, and at the request of the Board to ensure a consistent solution, based on the Variant TLD Recommendations, for IDN variant ccTLDs and IDN variant gTLDs, the work under ccPDP4 must be coordinated with the GNSO by mutually informing each other on the progress with respect to the selection of IDN TLD variants.

Finally, in July 2022, the ccPDP4 was tasked to look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii) (exclusion of the Independent Review Process and Reconsideration), and, if in their view clarification is needed, make a recommendation to that effect.

Section 4 - Process To date

The full Working Group started its work on September 8, 2020. The first actions were agreeing on rules of engagement, working method, and the chair and vice-chair nomination. With respect to the working method, the WG agreed to use the 2-reading method to adopt any proposals to ensure that the membership always has an opportunity to weigh in. The WG also agreed that subgroups would develop proposals in areas of Variant Management, Deselection and Confusing Similarity, and after completion by the subgroup would be discussed by and needed to adopt by the Full group. The full Group developed the proposals regarding the Review Mechanism and undertook the stress testing of the proposed policy.

Since 8 September 2020 (the first meeting) the group met 67 times to date (up and until 13 February 2024). The full group completed its initial review and update of the basic proposals (as included in the 2013 Board Report, and reviewed by the ccNSO Preliminary Review Team), in September 2021. The Variant Management subgroup started its work in March 2021 and after 30 meetings concluded its work in July 2022, The Deselection subgroup started in September 2021 and concluded its work in February 2023 after 8 meetings. The Confusing Similarity subgroup started in March 2022 and concluded its work in January 2023, after 15 meetings. The stress testing and analysis of the public comments received on the Initial Report was completed by the full working group.

The Working Group exchanged liaisons with the GNSO IDN EPDP effort to ensure coordination of the efforts with respect to developing policy recommendations pertaining to the definition of Variants and Management of Variants, as requested by the ICANN Board of Directors and in with the Working Group's Charter. The two groups also met regularly to compare notes and the subgroup Variant Management made extensive use of the same basic documentation developed by SSAC and ICANN staff as the GNSO EPDP group. In February 2023 the Board appointed a liaison and alternate, who regularly attended the meetings.

Since ICANN71 the full Working Group regularly provided updates to the community on its work, including seeking feed-back on the proposals from the ccTLD community. Presentations to the community can be found on the wiki-space of the group.

Notes and Observations
In response to public comments on its Initial Report the WG noted that was very aware of the need to develop consistent policies, both between GNSO IDN EPDP phase 1 and the ccPDP4 and between ccPDP4 and the broader body of ccTLD related policies.

The working groups notes that consistency and/or consistent means " free from variation or contradiction" or "holding to the same principles." With respect to the consistency between the GNSO IDN EPDP and ccPDP4 developed policies the WG is of the view that on the one hand there is no requirement that he policies should be the same i.e completely similar. On the other hand the policies should not contradict each other. As noted in Annex E of the Initial Report the GNSO IDN EPDP and ccPDP4 proposals are not the same in details, but it is also noted in the initial ICANN staff analyses of the proposed policies they do not contradict each other, but merely stress or limit different aspects of variant management. As stated in Annex D of this Report, the differences result from among others, the differences in policy development processes, scope of the issues that need to be addressed, and principles or design criteria underlying the choices made by the WGs.

The Working Group identified two areas within the Variant and Variant Management space of its work that were considered out of scope of its policy development remit. These areas are:

(i) expectation with respect to submission of IDN tables in the IANA repository by (IDN) ccTLD Managers
(ii) "same entity" requirement for registration of variant IDN domain names at second or lower levels under a (IDN or ASCII) ccTLD.

The Working group is of the view that both topics dis need to be raised, realizing they are out of scope of the policy remit of the ccNSO. For that reason, the working group agreed to provide recommendations in these areas as advise to ccTLD managers and requests the Council to support the advice, subject to the internal rules of the ccNSO.

Section 5 - Have the topics and issues identified in the Issue Report been resolved?

The main topics to be addressed are suggested by the PRT in its Final Report as adopted by the ccNSO Council. The detailed results of the PRT were mapped against the 2013 Board Report IDN ccNSO Policy Development Process[13].

All topics and issues identified by the PRT were reviewed and where needed addressed. The results are included in this Report in Part A - sections 1-10, including, but not limited to an

[13] https://ccnso.icann.org/sites/default/files/filefield_41859/idn-ccpdp-board-26sep13-en.pdf

update of the recommendations to technical requirements and confusing similarity. The detailed results of the review can be found in the document repository of the working group on its wiki space.

The Policy is expected to include recommendations with respect to the definition of “variant” and recommendations pertaining to “variant management” as was also requested by the ICANN Board of Directors. The main recommendations are included in section 6 of the Report. In addition, the introduction of variants also has an impact on other areas, for example the retirement of IDNccTLDs, Delegation of IDNccTLDs and some procedures proposed under this Policy for example the scoping of the base for comparison for the Similarity Evaluation Procedure (section 6.2.3).

The events were defined which would cause the retirement policy as developed under the ccNSO Policy Development Process pertaining to the retirement of ccTLDs ccPDP3 part 1 to become effective. In section 12 various situations are described, which would trigger the retirement of IDNccTLDs. Once a “trigger event” is manifested it may result in a “Notice of Retirement” which would initiate the retirement of an IDNccTLD and its variants).

Finally, at the request of the ccNSO Council this Report includes recommendations with respect to the relevancy of the ccTLD review mechanism and the exclusion of claims etc. relating to the selection of IDNccTLDs strings from ICANN’s IRP and Reconsideration processes.

Part A – The Policy Recommendations

Section 1 - Policy Objective, Applicability and Principles

The objective of this policy is to provide a framework to ICANN and broader community for the selection of IDNccTLD strings and variants thereof, the delegation, transfer, revocation, and retirement of the selected IDNccTLD string and its variants, and the use of the review mechanism pertaining to decisions with respect to the delegation, transfer, revocation, and retirement of IDNccTLDs.

This policy does not amend nor change current policies for the delegation, transfer, revocation, and retirement of ccTLDs, rather it builds on these policies. However, it is recognized that due to the nature of an IDN TLD and its related variants additional, specific provisions are provided that are required for IDNccTLDs only, for example an IDNccTLD string and its Delegatable variants must be delegated to one and the same entity i.e., the same (IDN)ccTLD manager.

To guide the development, implementation and future interpretation of this policy, overarching principles or design criteria were defined considering the 2013 draft IDNccTLD policy, the experiences of the IDN Fast Track Process and subsequent discussions. The principles are:

I. Association of the (IDN) country code Top Level Domain with a territory. For purposes of this policy "Territory" or "Territories" are defined as a country, a subdivision, or other area of particular geopolitical interest listed in Section 3 of the 'International Standard ISO 3166, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes' [ISO 3166-1:2020] or, in some exceptional cases, e.g. grandfathered-in delegations, a country, a subdivision, or other area of particular geopolitical interest listed for an exceptionally reserved ISO 3166-1 code element.

Under the current policy for the delegation of (ASCII) ccTLDs[14], the country codes associated with Territories are eligible for delegation as a ccTLD. Therefore, only IDNccTLD strings associated with a Territory are eligible to be delegated as a ccTLD.

II. (ASCII) ccTLD and IDNccTLDs are all country code Top Level Domains. (ASCII) ccTLD and IDNccTLDs are all country code Top Level Domains and as such are associated with a Territory. Whilst there may be additional, specific provisions required for IDNccTLDs, due to their nature (for example criteria for the selection of an IDNccTLD string), all country code Top Level Domains should be treated in the same manner.

[14] RFC 1591 as interpreted by the Framework of Interpretation

III. Preserve security, stability, and interoperability of the DNS. To the extent different and/or additional rules are implemented for IDNccTLDs, these rules should:

- Preserve and ensure the security and stability of the DNS;
- Ensure adherence with the RFC 5890, RFC 5891, RFC 5892, RFC 5893, and their successors
- Consider and be guided by the Principles for Unicode Code Point Inclusion in Labels in the DNS Root (RFC 6912).

IV. Ongoing Process. Requests for the validation and delegation of IDNccTLDs should be an ongoing process and requests can be submitted at any time, which also applies to variants of IDNccTLD strings. The delegation of a ccTLD (both ASCII and/or IDN and/or variants of the IDNccTLD that meet the criteria) can be requested at any time, once all the criteria are met.

V. Criteria determine the number of IDNccTLDs. The criteria to select the IDNccTLD string should determine the number of eligible IDNccTLDs per Territory, not an arbitrarily set number.

Section 2 - Overview of the applicable policies

2.1 Selection, delegation, transfer, revocation, and retirement of IDNccTLD strings

Under the proposed policy a two-stage process is recommended for the selection of an IDNccTLD string:

- Step 1: String selection stage in Territory
- Step 2: Validation of IDNccTLD string

The policy recommendations with respect to the process, procedures and required documentation, if any for the selection of IDNccTLD strings and their variant(s), will be described both at a general level below and a more detailed level for both stages in sections 3 - 10 below.

As stated above, this policy does not amend nor change current policies for the delegation, transfer, revocation, and retirement of ccTLDs, rather it builds on these policies. However, it is recognized that due to the nature of an IDN TLD and its related variants additional, specific provisions are provided that are required for IDNccTLDs only, for example an IDNccTLD string and its Delegatable variants must be delegated to one and the same entity i.e., the same (IDN)ccTLD manager. Therefore, once the IDNccTLD a selected IDNccTLD string and/or its variant(s) are deemed to be valid and meet the criteria, delegation can be requested following the regular policy and IANA procedures for delegation of ccTLDs.

2.1.1 Stage 1: String Selection in Territory

General Description

The string selection stage is a local matter in Territory and should ideally involve all relevant local actors in Territory. The actors in Territory must:

1. Select the IDNccTLD string. Identify the language and script and select the IDNccTLD string. The selected string must meet the meaningfulness and technical requirements and should not be confusingly similar as defined under this policy.
2. Seek endorsement /support by the relevant stakeholders in Territory for the selected string.
3. Select the intended IDNccTLD string requester before submitting an IDNccTLD string for validation. In cases where the string requester is not yet selected, the relevant public authority of the Territory may act as nominee for the to be selected string requester.

As advised in Part B there is also an expectation, which is not mandatory, that the requester prepare the IDN table for the language /script combination in which the IDN ccTLD string is expressed, based on the Label Generation Rule for the selected language / script combination and submit this table with IANA.

As part of the in territory step the following documentation must be prepared:

i. Documentation of the meaningfulness of the selected IDNccTLD string and/or the requested variant strings is/are according to requirements described in section 3.2.5
ii. Documentation selected string and/or the requested variants is/are in Designated Language is according to requirements described in section 3.2.6.
iii. Documentation of required endorsement / support for selected string or requested variants of the selected string by Significantly Interested Parties, according to requirements described in section 4.2

Notes and Comments
As stated, the string selection stage is a local matter in Territory and should ideally involve all relevant local actors in Territory. Typically, this would include:

- The IDNccTLD string requester. This actor initiates the next step of the process, provides the necessary information and documentation, and acts as the interface with ICANN. Typically, this actor is the expected IDNccTLD manager.
- Significantly Interested Parties.
  - The relevant public authority of the Territory associated with the selected IDNccTLD.
  - Parties to be served by the IDNccTLD. They are asked to show that they support the request and that it would meet the interests and needs of the local Internet community.

Additionally, these actors may wish to involve recognized experts or expert groups to assist them to select the IDNccTLD string, prepare the relevant IDN Table or assist in providing adequate documentation.

Further, and at the request of the actors in Territory, ICANN may assist them with the in-Territory Process.

2.1.2 Stage 2: Validation of IDNccTLD string

General description
The String Validation stage is a set of procedures to ensure all criteria and requirements regarding the selected IDNccTLD string have been met. Typically, this would involve:

- The IDNccTLD string requester. The IDNccTLD requester initiates this stage of the process by submitting a request for adoption and associated documentation.
- ICANN staff. ICANN staff will process the submission and coordinate between the different actors involved.
- External, Independent Panels (Technical, Similarity & Risk Mitigation Appraisal) to validate the selected string and its variant(s).

The activities during this stage would typically involve:

- Submission of selected string and its requested variants and related documentation.
- Validation of selected IDNccTLD string and/or the requested variants:
    a. ICANN staff validation of request. This includes:
        i. Completeness of request
        ii. Completeness and adequacy of Meaningfulness and Designated Language documentation
        iii. Completeness and adequacy of support from relevant public authority
        iv. Completeness and adequacy of support from other Significantly Interested Parties

    b. Independent Validations
        i. Technical Validation (Technical requirements and RZ-LGR)
        ii. String Confusion Validation
- Publication of selected IDNccTLD string on ICANN website
- Completion of string Selection Process
- Change, withdrawal, or termination of the request.

2.2 Delegation, Transfer, Revocation and Retirement of IDNccTLD strings

2.2.1 Applicability of other Policies

All ccTLD policies with respect to the delegation, transfer, revocation, and retirement of ccTLDs are applicable to the delegation, transfer, revocation, and retirement of (variant) IDNccTLDs. However, specific requirements under such a policy may vary for the selected IDNccTLD string and its variants if foreseen under this policy. This is further detailed in sections 2.2.2 below and sections 11 and 12.

For avoidance of doubt if a selected IDNccTLD string is transferred, revocated, or retired, all Delegatable Variants which have been delegated, shall follow the transfer, revocation, or retirement of the selected IDNccTLD string, unless otherwise proposed (see section 13)

2.2.2 Specific requirement following the retirement of the selected IDNccTLD string

Following the conclusion of its retirement process a selected IDNccTLD string is removed from the DNS, the selected IDNccTLD string shall not be available for re-assignment or selection for at least 10 years following the removal. During this period of 10 years the ccNSO is expected to launch a ccNSO Policy Development Process on the issue of re-use of IDNccTLD strings and its variants. Factors to consider in such a ccPDP on possible re-use are:

- Use of the IDNccTLD before retirement
- Cause of retirement
- Possible re-use of the IDNccTLD string

- Mechanism to allow re-use

Notes and Observations
Under ISO3166-1 there is a standard cool down -period (or a removal of the territory from the ISO3166- 1 standard. Accordingly (section 7.6.2) *Country code elements that the ISO 3166/MA has altered or deleted should not be reassigned during a period of at least fifty years after the change. The exact period is determined in each case based on the extent to which the former code element was used.*

Although a request for re-use may be very unlikely (considering that the selected string must be a meaningful representation of the name of the Territory) a cooling down is believed to be warranted to avoid overlap with earlier TLDs and other potential issues resulting from other uses of the IDNccTLD string that is removed.

2.2.3 Review Mechanism for decisions under the proposed policy

As under the proposed ccPDP3 Review Mechanism policy – if a ccTLD Manager is directly impacted by the IANA Function Operator (IFO) - it is proposed that the review mechanism should be available to IDNccTLD Managers.

Some proposals under this proposed policy may result in ICANN decisions to deselect an IDNccTLD string and/or its variants, and hence to retire an IDNccTLD or its variants. According to the ccTLD retirement policy (as adopted in September 2022), the retirement of an (IDN)ccTLD requires the IFO to serve a Notice of Retirement to the (IDN)ccTLD Manager. This Notice formally starts the (clock of the) ccTLD retirement process.

In addition, and specifically for the IDNccTLD Manager the proposed review mechanism should be available if the manager is served a Notice of Retirement following the deselection of an IDNccTLD string and/or its variants strings resulting from:

- Change of Name of the Territory, Change of designated language, Change of script or writing system (See section 12)
- Impact IDNccTLD string becomes contentious within the Territory (See section 12 below).

Section 3 - Selection of IDNccTLD Strings

3. Criteria for the selection of IDNccTLD strings

3.1 Minimal Number of non-ASCII characters

An IDN country code Top Level Domain must contain at least one (1) non-ASCII character (i.e a character that is not included in ISO/IEC 646 Basic Character Set). To illustrate this criterion: For example, *españa* would qualify under this specific requirement and *italia* would not. Note that *españa* contains at least one (1) non-ASCII character (i.e a character that is not included in ISO/IEC 646 Basic Character Set[15] . For more formal definitions of these terms, see RFC 5890.

Further, the selected U-label of the requested string, whether the selected IDNccTLD string or a requested variant of the selected string, must contain at least two characters[16]. This requirement should be reviewed as part of the first review of the policy (see section 14 below).

Notes and Observations

Note 1 - If a single character string meets all criteria, nothing would prevent it from being requested. However, note that in SAC 052 (2012): two potential issues were identified:

- Single Character TLDs are more likely to cause user confusion than TLDs with more characters
- Work on user confusion/string similarity and IDN variants needs to be completed,

Currently, the work on confusion/ string similarity is not completed nor will it be completed in foreseeable future. Therefore, the concerns raised in SAC052 are still relevant. Considering the need to ensure the security and stability of the DNS, the application for Single character IDNs under this proposed policy is currently deferred.

Note 2 - The policy does only implicitly address the case where a selected IDNccTLD string contains non-ASCII code point, however its variant is an ASCII only code points. This is due to RZ-LGR-5 which cannot generate any allocatable ASCII variant labels for non-ASCII code points.

3.2 Meaningfulness Criteria and related processes and procedures

[15] https://www.iso.org/standard/4777.html

[16] The term character is used to denote Base Character as defined in Unicode. This would address cases in many scripts for IDNs based on RZ-LGR (Arabic, Chinese, alphabetic scripts like Latin and Cyrillic, etc.) where two characters may represent a single base character, e.g.: U+025B (ɛ) U+0308 (◌̈) = ɛ̈ . For scripts used in South Asia and Southeast Asia, this would mean that the string will contain at least two consonants/independent vowels (here consonant+dependent-vowel combination will not be sufficient; some complications arise due to conjunct consonants).¨

3.2.1 The IDNccTLD string must be a Meaningful Representation of the name of a Territory. The principle underlying the representation of Territories in two letter (ASCII) code elements is the visual association between the names of Territories (in English or French, or sometimes in another language) and their corresponding code elements. The principle of association between the country code string and the name of a Territory should be maintained with respect to IDNccTLD strings. A selected IDNccTLD string must be a meaningful representation of the name of the Territory. A country code string is considered to be a Meaningful Representation if it is:

a) The name of the Territory[17]; or
b) Part of the name of the Territory that denotes the Territory[18]; or
c) A short-form designation for the name of the Territory, recognizably denoting the name[19].

3.2.2 Meaningful Representation of the name of the Territory must be in a Designated Language of the Territory. The selected IDNccTLD string should be a Meaningful Representation of the name of the territory in a Designated Language of that Territory. For this purpose, a Designated Language[20] is defined as: a language that has a legal status in the Territory or that serves as a language of administration[21].

A language is defined as a Designated Language if one or more of the following requirements is/are met:

a) The language is listed as "Official Language" for the relevant Territory as an ISO 639 language in Part Three of the "Technical Reference Manual for the standardization of Geographical Names", United Nations Group of Experts on Geographical Names (the UNGEGN Manual).
b) The language is listed as an administrative language for the relevant Territory as defined in section 3.7 of ISO 3166-1 standard [2020].

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[17] A ASCII example: "Kingdom of the Netherlands"
[18] An example related to example in note 16: "Netherlands"
[19] An example related to examples in footnote 16 and 17: "NL"
[20] The limitation in number of languages of potential languages to Designated Language is recommended for reasons of stability of the DNS. Depending on the source and according to some statistics currently 6909 living languages have been identified. See for example: http://www.ethnologue.com/ethno_docs/distribution.asp?by=area. If one IDNccTLD would be allowed per territory in every language this would potentially amount to 252*6909 or approximately 1.7 million IDNccTLDs
[21] The definition of **Designated Language** is based on: "Glossary of Terms for the Standardization of Geographical Names", United Nations Group of Experts on Geographic Names, United Nations, New York, 2002 . Note that in the Glossary the term "Official Language" is used. This term is not used as experience has shown that depending on the specific Territory "Official Language" has a specific connotation, which sometimes creates confusion with the term "Official Language" as defined in the Glossary.

c) The relevant public authority in the Territory confirms that the language is used in official communications of the relevant public authority and serves as a language of administration.

Specific requirements regarding documentation of Designated Languages are included in the procedures and documentation sections (See section 3.2.7).

3.2.3 Only one (1) IDNccTLD string per Designated Language. If there is more than one Designated Language in the Territory, one (1) unique IDNccTLD for each Designated Language may be selected, provided the Meaningful Representation in one Designated Language cannot be confused with an existing IDNccTLD string for that Territory.

It should be noted that for purposes of this policy, the restriction of one (1) IDNccTLD string per Designated Language does not apply to the selection and delegation of variants of the selected IDNccTLD string, however this exception applies only to the extent the other requirements under this policy for the request and the delegation of variants of the selected IDNccTLD string are met.

Where a language is expressed in more than one script in a Territory, then it is permissible to have one string per script, although the multiple strings are in the same Designated Language.

Notes and Observations It should be noted that other requirements relating to non-confusability are applicable and should be considered, including the specific procedural rules and conditions for cases when the same manager will operate two or more (IDN) ccTLD's which are confusingly similar.

3.2.4 If the selected string is not the long or short form of the name of a Territory then evidence of meaningfulness is required. If the selected IDNccTLD string is the long or short form of the name of the relevant Territory in the Designated Language and is listed in the UNGEGN Technical Reference Manual for the Standardization of Geographic Names, Part Three column 3 or 4 version 2007[22], or a later version of that list, it is a Meaningful Representation.

If the Meaningful Representation of the selected string is not listed in the UNGEGN Technical Reference Manual for the Standardization of Geographic Names, Part Three column 3 or 4 version 2007, or a later version of that list, then meaningfulness must be

[22] https://unstats.un.org/unsd/ungegn/pubs/documents/UNGEGN%20tech%20ref%20manual_m87_combined.pdf . Note that the UNGEGN Technical Reference Manual only contains the names of 192 Countries, which is a sub-set of all the Territories listed under the ISO 3166 standard.

adequately documented. Adequate documentation must be provided if one of the following cases applies:

1. The selected IDNccTLD string is not the long or short form name of the Territory as included in the UNGEGN Manual in the Designated Language,
   or
2. The selected IDNccTLD string is an acronym of the name of the Territory in the Designated Language
   or
3. The selected IDNccTLD string is the name of a Territory that does not appear in the UNGEGN Manual,
   or
4. The selected IDNccTLD string is in a Designated Language that is not included in the UNGEGN Manual.

If such documentation is required, the documentation needs to clearly establish that:

- The meaning of the selected string in the Designated Language and English and
- That the selected string meets the meaningfulness criteria.

Specific requirements regarding documentation to demonstrate the Meaningful Representation are included in the procedures and documentation recommendations (see section 3.2.5 and 3.2.7 below).

3.2.5 Documentation of the meaningfulness of the selected IDNccTLD string

The selected IDNccTLD string(s) must be a Meaningful Representation of the name of the corresponding Territory. A string is deemed to be meaningful if it is in the Designated Language of the Territory and if it is:

1. The name of the Territory; or
2. A part of the name of the Territory denoting the Territory; or
3. A short-form designation for the name of the Territory that is recognizable and denotes the Territory in the selected language.

The meaningfulness requirement is verified as follows:

1. If the selected string is listed in the UNGEGN Manual, then the string fulfills the meaningfulness requirement.
2. If the selected string is not listed in the UNGEGN Manual, the requester must then substantiate the meaningfulness by providing documentation from an internationally recognized expert or organization.

ICANN should recognize and accept documentation from one of the following experts or organizations as internationally recognized:

- National Naming Authority – A government recognized National Geographic Naming Authority, or other organization performing the same function, for the Territory for which the selected string request is presented. The United Nations Group of Experts on Geographical Names (UNGEGN) maintains such a list of organizations at: https://unstats.un.org/unsd/geoinfo/ungegn/publications.html [unstats.un.org]
- National Linguistic Authority – A government recognized National Linguistic Authority, or other organization performing the same function, for the Territory for which the selected string request is presented.

In the exceptional circumstance where there is no access to a National Naming Authority nor to a National Linguistic Authority for the Territory, assistance may be requested from ICANN to identify and seek reference to an expert or organization to provide the required documentation. This documentation will be considered acceptable and sufficient to determine whether a string is a Meaningful Representation of a Territory name.

ICANN should include a procedure in the implementation plan, including a timeframe, to identify expertise referred to or agreed as set out in the final paragraph of section 3.2.5 above.

Notes and Observations.
ICANN should include in the implementation plan an example of the documentation that demonstrates the selected IDNccTLD string(s) is a Meaningful Representation of the corresponding Territory.

3.2.6 Documentation Designated Language. The requirements for allowable languages and scripts to be used for the selected IDNccTLD string is that the language must be a Designated Language in the Territory as defined in section (see above). The language requirement is considered verified if one of the following conditions is met:

1. If the language is listed for the relevant Territory as an ISO 639 language in Part Three of the *Technical Reference Manual for the standardization of Geographical Names, United Nations Group of Experts on Geographical Names* ("UNGEGN Manual"):

   or

2. If the language is listed as an administrative language for the relevant Territory in ISO 3166-1;

   or

3. If the relevant public authority of the Territory confirms that the language is used or serves as follows, (either by letter or link to the relevant government constitution or other online documentation from an official government website):

a. Used in official communications by the relevant public authority;

or

b. Serves as a language of administration.

Further, the documentation must include a reference to the script or scripts in which the Designated Language is expressed, and which must be listed in the script charts of the latest version of UNICODE.

ICANN is advised to include an example of the documentation that the selected language(s) is considered designated in the Territory in the implementation plan. However, this is considered a matter of implementation.

Section 4 - Required Support for the selected IDNccTLD string

4.1 The selected IDNccTLD string must be non-contentious within the Territory.

The selected IDNccTLD string must be non-contentious within the Territory. The non-contentiousness is evidenced by a statement of support/endorsement/non-objection by the significantly interested parties[23] in the Territory.

ICANN should include an example of the documentation required to demonstrate the support or non-objection for the selected string(s) in the implementation plan.

If during the process for selecting an IDNccTLD string concurrent requests for the same or more IDNccTLD strings in the same Designated Language for the same Territory are submitted, they shall be considered competing requests and are therefore deemed to be contentious within the Territory. Before any further steps are taken in the selection process, this issue needs to be resolved in Territory, before proceeding with any of the requests. If a concurrent request for an IDNccTLD string is received after the validation of the first requested IDNccTLD string has been completed and the requested IDNccTLD is published (see section 9, below), this second request shall be considered erroneous and section Change, withdrawal, or termination of the request section 10 below applies.

4.2 Endorsement / support/non-objection for selected string by Significantly Interested Parties and others

4.2.1 Significantly Interested Parties. Significantly Interested Parties include but are not limited to:

1. the government or territorial authority for the Territory associated with the IDNccTLD string and
2. any other individuals, organizations, companies, associations, educational institutions, or others in the Territory that have a direct, material, substantial, legitimate, and demonstrable interest.

[23] The concept Significantly Interested Parties is derived from RFC 1591 and used as detailed in the Framework of Interpretation. Accordingly: The FOIWG interprets "Significantly Interested Parties" (section 3.4 of RFC1591) to include, but not be limited to: a) the government or territorial authority for the country or territory associated with the ccTLD and b) any other individuals, organizations, companies, associations, educational institutions, or others that have a direct, material, substantial, legitimate, and demonstrable interest in the operation of the ccTLD(s) including the incumbent manager. To be considered a Significantly Interested Party, any party other than the manager or the government or territorial authority for the country or territory associated with the ccTLD must demonstrate that it is has a direct, material, and legitimate interest in the operation of the ccTLD(s). The FOIWG interprets the requirement for approval from Significantly Interested Parties (section 3.4 of RFC1591) to require applicants to provide documentation of support by stakeholders and for the IANA Operator to evaluate and document this input for delegations and transfers

To be considered a Significantly Interested Party, any party other than the government or authority for the Territory associated with the selected IDNccTLD must demonstrate that it has a direct, material, legitimate and demonstrable interest in the operation of the proposed IDNccTLD(s).

4.2.2 Others - Requesters should be encouraged to provide documentation of the support of stakeholders for the selected string, including an opportunity for stakeholders to comment on the selection of the proposed string via a public process. "Stakeholders" is used here to encompass Significantly Interested Parties, "interested parties" and "other parties."

4.2.3 Classification of input

For procedural purposes the following cases should be distinguished:

- Request for the full or short name of Territory (as defined in Section 3).
- Other cases, where additional documentation is required.

In both cases the relevant Government / Public Authority needs to be involved and at a minimum its non-objection should be documented.

Notes and Observations.
In cases that additional documentation is required:

- Unanimity should NOT be required.
- The process should allow minorities to express a concern i.e., the process should not be used against legitimate concerns of minorities
- The process should not allow a small group to unduly delay the selection process.

Section 5 – Variants and Variants Management

5.1 Introduction

In the Variant Management section, the following two questions with respect to (IDN)ccTLDs are addressed:

- How are variants of the selected IDNccTLD string defined?
- How should variants of the selected IDNccTLD string be managed?

With respect to the first question - the definition of TLD Variants -, the ICANN Board resolved on 11 Apr. 2013 to implement the Label Generation Rule (LGR) Procedure for the Root Zone (RZ). For the IDNccTLD policy implementation the RZ- LGR is supported.

With respect to the second question, the management of the IDNccTLD variant, the results of the deliberations are included in this section of the document as well. The work to date is based on the following documents and background material:
The ICANN Board of Directors resolutions:

- approved on 14 March 2019 IDN Variant TLD Recommendations and requested ccNSO and GNSO take into account the recommendations while developing their respective policies to define and manage the IDN variant TLDs for the current TLDs as well as for future TLD applications, and communicate for a consistent solution.
- approved on 26 January 2020 Recommendations for the Technical Utilization of the Root Zone Label Generation Rules and requested the ccNSO and GNSO Councils take into account the Recommendations while developing their respective policies to define and manage the IDN variant TLDs for current TLDs as well as for future TLD applications.

In addition, and to ensure the coordinated and consistent approach as requested, the IDN Variant TLD Recommendations were first reviewed. In addition, the GNSO view on these Recommendations were considered and the ccPDP4 working group was kept apprised about the progress of the GNSO EPDP in this area as well as on the latest work of SSAC in this area (SAC 120).

The recommendations on the Technical Utilization of RZ-LGR were also considered. Again, first the recommendations as adopted. In addition, the GNSO view on these recommendations, if any, was considered

Recommendations and advice.

During the development of the policy, issues were identified pertaining to the IDN Tables i.e the use of variants at second or lower level.

It was considered that addressing the issues pertaining to use of variants at second level would be needed to ensure stability, security, and interoperability of the DNS, however this would

be outside the remit of a ccNSO policy. Therefore, the working group opted to include advice to ccTLD managers. This advice to ccTLD Managers is not part of the recommended policy and is subject to Internal Rules of the ccNSO pertaining to advise to ccTLD Managers

The policy recommendations pertaining to management of variant IDNccTLDs are contained in Part A of this section Report (section 5.2 – 5.5 below). The advice to IDNccTLD Managers is contained in Part B (sections 1 and 2) of this Report.

5.2 IDNccTLD Variants

5.2.1 Variants. The set of variant labels of a given (IDN*) ccTLD string or label is defined by the RZ-LGR. It is calculated by the RZ-LGR using the selected ccTLD string as the primary label. This calculation also assigns exactly one of two disposition values to each variant label (allocatable or blocked). Only the allocatable labels may be eligible for allocation or delegation as a top-level domain. See RFC 8228 for details.

Compliance with Root Zone Label Generation Rules (RZ-LGR, RZ-LGR-2, and any future RZ-LGR rules sets) shall be required for the generation of an IDNccTLD string and its variants, including the determination of whether the string is Blocked or Allocatable. IDN TLDs must comply with IDNA2008 (RFCs 5890-5895) or its successor(s).

Notes and Observations
The variants of a given (IDN*) ccTLD string or label are understood to mean those labels that are considered to be (almost) the same as the original string.

- IDN TLDs must comply with IDNA2008 (RFCs 5890-5895) or its successor(s).
- All selected IDNccTLD strings must be processed using the RZ-LGR:
    - to determine if they are valid and.
    - Calculate Variants. Use RZ-LGR to assign status blocked or allocatable disposition to the variant strings/labels.

Note that the description of variants is not really requiring the ccTLD string to be an IDN string. Using this definition variants for non IDN ccTLD strings can be defined. However this is outside the scope of this ccPDP.

5.2.2 Scripts integrated into RZ-LGR. For the scripts and writing systems which have been integrated into the RZ-LGR, the RZ-LGR must be the only source for processing the following cases:

- Validate an applied-for TLD string and determine its variant string(s) with corresponding dispositions

- Calculate variant strings, and corresponding disposition values, for each one of the already delegated TLD Strings.

5.2.3. Limitation of delegation of variants. Only Allocatable Variants of the selected IDNccTLD string that are Meaningful Representations of the name of the Territory in the Designated[24] Language is eligible to be delegated (hereafter: Delegatable Variant or Delegatable Variants)

These criteria shall be subject of the first review of the IDNccTLD string selection policy, as foreseen in Section 14 Review of policy for the selection of IDNccTLD strings.[25]

Notes and Observations
For variants to be eligible for delegation, section 5.2.3 implies that all criteria apply and the required documentation and support from the Significantly Interested Parties must be available for all requested variants before validation. The proposal is attempting to strike a balance between the legitimate need for variants of an IDNccTLD to avoid user confusion and the general responsibilities for the security and stability of the root by the need to limit proliferation of strings at the root level.

5.2.4. Impact of possible amendment of RZ-LGR. It is expected that the RZ-LGR be revised throughout its lifecycle, because a new script LGR is being integrated or a revision of an existing script LGR is being integrated into the Root Zone LGR. There may be a case where the update in the Root Zone LGR does not support an existing IDNccTLD. In such a case, the delegated IDNccTLD(s), both the selected and delegatable variant(s), must be grandfathered.

[24] Taking on suggestion to put "designated" between brackets. For later discussion input from the Arabic script/language community is needed on what the impact of this limitation would be.
[25] **Section 14.3. Review of policy for the selection of IDNccTLD strings** It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances. It is also recommended that the ccNSO Council initiates such a review by launching a review group who will be tasked to review the ascertain whether the policy needs to be updated and advise the ccNSO Council on the proposed method for such an update. The scope and working method of such a review must be determined by the ccNSO after consulting relevant stakeholders, and consider the experience with the ccPDP4 process and relevant circumstances and developments with respect to IDN TLDs
In the event such a review results in a recommendation to amend the policy, the rules relating to the country code Policy Development Process as defined in the ICANN Bylaws should apply.

Notes and observation
Section 5.2.4, on the impact of possible amendment of the RZ-LGR was amended following the stress testing. Originally it stated that if an amendment would demonstrably threaten the stability and security of the DNS, deselection and hence retirement of the IDNccTLD string and/or its delegated variants may be the only measure.

However, according to the ccTLD retirement policy, the retirement may take at least five (5) years. and is not governed by this policy but by the retirement policy. As a result, the threat to the DNS will remain during this period of retirement and prior to the removal for the DNS Root zone file.

In addition, changes to the RZ-LGR consider external influences and only become effective after an extensive public consultation. This public consultation provides opportunities to the community to advise of the potential threat caused by the proposed change of the RZ-LGR.

5.3 Allocation of Variant Top Level Domain strings to the same entity. The set of allocatable variant strings that is generated from the selected IDNccTLD string by applying the RZ-LGR, must be:

- Allocated to one and the same entity: the requestor (the entity that submits the selected IDNccTLD string),
- Delegated or transferred to one and the same entity the IDNccTLD Manager or withheld for possible future delegation to that IDNccTLD Manager.

In other words, for a selected top-level label T1, its allocatable variant label(s) T1V1,…, T1Vx shall only be allocated to the IDNccTLD requestor, or - after the delegation process for the selected IDNccTLD string has been initiated - delegated to the same IDNccTLD Manager or withheld for possible delegation to that IDNccTLD Manager.

If a specific IDNccTLD is operated by a ”back-end” registry service provider under arrangement with the IDNccTLD Manager or will be operated by a “back-end” registry service provider under arrangement with the IDNccTLD Manager, then that “back-end” service provider must operate all delegated variants of that specific IDNccTLD as well.

5.4 No selected IDNccTLD, no variants. According to section 5.2.1 and 5.2.2 above, Variants of the selected sting are derived from and directly related to the selected IDNccTLD through the RZ-LGR, in other words, if there is no selected IDNccTLD then there are no variants.

As a result, and general rule, the deselection of Selected IDNccTLD string must result in deselection of its variant strings.
However, this proposed policy does provide for a specific exemption on this general rule: If a Selected IDNccTLD is deselected as result of the lack of support by the Significantly Interested Parties (see section 4.2.2 for definition of SIP and section 12.5 below for the

mechanism) then a Delegated Variant may remain to be delegated if continuation of the delegation of the Delegatable variant IDNccTLD string is explicitly supported by the Significantly Interested Parties.

5.5 Requesting variants of already selected IDNccTLD strings. Under the Fast Track Process a requestor could not request any variants. Only after a script has been integrated into the RZ-LGR, variants can be calculated and hence applied for. According to Principle IV the request for (and delegation of) IDNccTLDs, is an ongoing process.

It is implied in the Fast Track Process Implementation Plan (FIP) (section 3.4 of the FIP) and section 5.2.2 of this proposed policy that variants can be requested after the selected string was delegated (including Delegatable variants of IDNccTLD strings that were delegated under the Fast Track Process). However, as implied in section 3.4 of the Fast Track Implementation Plan IP, and 5.2.2 above, a variant is only valid if at the time of application, it is valid according to the RZ-LGR.

A Desired Variant String (a variant that was requested under the Fast Track Process) is only eligible if when generated as variants through RZ-LGR is allocatable according to the RZ-LGR.

Therefore, if according to the RZ-LGR at the time of submission of the application the variant of a selected IDNccTLD string is an allocatable variant of that IDNccTLD string it is “valid” under the RZ-LGR, and eligible assuming all other criteria are met.

If according to the RZ-LGR at the time of submission of the application of IDNccTLD string the requested variant is a blocked variant of the selected IDNccTLD string, it is deemed to be “not valid” and therefore not eligible.

Finally, it is noted that there is an assumption that the requester and relevant community using the script in which the IDNccTLD string is expressed have participated in the related script generation panel. This would have allowed the requester and Significantly Interested Parties to build an alternative case with respect to variant strings and its variants.

Section 6 -Technical & Other String Requirements

6.1 Technical Criteria

The requested selected IDNccTLD string and its requested variants must abide by all Technical Criteria for an IDN TLD string. In addition to the proposed general requirements for all labels (strings), the selected IDNccTLD string must abide by the normative parts of RFC 5890, RFC 5891, RFC 5892, and RFC 5893.

All selected IDNccTLD strings must be processed using the RZ-LGR to determine:

1. if they are valid and
2. Calculate variant IDNccTLDs and determine whether the variant string is blocked or allocatable.

If the RZ-LGR is applied to the selected IDNccTLD string (for a script used to express the meaningful representation in the Designated Language), and this results in variant ASCII 2-letter string (Any combination of two ISO 646 Basic Version (ISO 646-BV) characters[26] (2-letter [az] codes), these variants be:

- Blocked and
- Result in not allowing the selected IDNccTLD (to maintain the predictability of the current ccTLD delegation policy

For the scripts and writing systems which have been integrated into the RZ-LGR, the RZ-LGR must be the only source for processing the following cases:

- Validate a requested IDNccTLD string and determine its variant string(s) with corresponding dispositions
- Calculate variant strings, and corresponding disposition values, for each one of the already delegated TLD Strings

All applicable technical criteria (general and IDN specific) for IDNccTLD strings should be documented as part of the implementation plan. For reasons of transparency and accountability they should be made public prior to implementation of the overall policy and endorsed by the ccNSO.

Validation that a string meets the technical criteria is a process step and shall be conducted by an external, independent panel. The recommended procedure is described in Section 7.

[26] Also known more commonly as ASCII. Note however that ASCII is a term that may describe various character sets: see https://en.wikipedia.org/wiki/ASCII (Reference updated following discussion 28 March 2023)

The method and criteria for the technical and RZ-LGR conformity validation should be developed as part of the implementation plan and are a critical part of the validation process. For reasons of transparency and accountability they should be made public as part of the implementation of the overall policy and endorsed by the ccNSO before becoming effective.

6.1.1 Conformity to RZ-LGR

At the time the selected IDNccTLD string is submitted for validation, the script in which the selected IDNccTLD string is expressed must be in compliance with the RZ-LGR i.e., the Label Generation Rules (LGR) for the script/writing system in which the Designated Language is expressed must be integrated in the Label Generation Rules for the Root Zone.

If at the time the requested IDNccTLD string is submitted for validation the LGR for the writing system or script in which the Designated Language is expressed has not been generated or is not yet integrated in the RZ-LGR, or if the selected IDNccTLD string is not in compliance with the RZ-LGR, then ICANN shall inform the requester and section 10, applies accordingly.

The risk of selecting a potential “invalid” string should remain with the selecting parties and hence no review mechanism is necessary for this aspect of the process. Therefore, if a selected IDNccTLD string - of which the script is supported by the RZ-LGR - is determined to be “invalid” according to the RZ-LGR, it shall not pass the string evaluation phase and section 10 below shall apply accordingly.

6.2 Confusing Similarity

6.2.1 Goal Confusing Similarity validation.

The goal of the confusing similarity validation is to minimize the risk to the stability and security of the DNS due to user confusion by exploiting potential visual confusing similarity between domain names (e.g., be in Latin script vs бе in Cyrillic) As such confusing similarity should therefore be minimized and mitigated. The risk of visually confusing similarity is not a technical DNS issue but can have an adverse impact on the security and stability of the domain name system.

6.2.2 Standard for visual similarity.

A selected IDNccTLD string is considered confusingly similar with one or more other string(s) (which must be either Valid-U-labels or any a combination of two or more ISO 646 BV characters) if the appearance of the selected string in common fonts in small sizes at typical screen resolutions is sufficiently close to one or more other strings so that it is probable that

a reasonable Internet user who is unfamiliar with the script would perceive the strings to be the same or confuse[27] one for the other[28].

Notes and Observations Section 6.2.1 & 6.2.2
The rule on confusing similarity originates from the IDNC WG and Fast Track Implementation Plan and was introduced to minimize the risk of confusion with existing or future two letter country codes in ISO 3166-1 and other TLDs. This is particularly relevant as the ISO 3166 country codes are used for a broad range of applications, for example but not limited to, marking of freight containers, postal use and as a basis for standard currency codes.
The risk of string confusion is not a technical DNS issue but can have an adverse impact on the security and stability of the domain name system, and as such should be minimized and mitigated.

Some members of the WG question whether the risks associated with confusing similarity of (cc) TLDS is an issue and if so, whether it that needs to be addressed through the policy. With respect to the latter, it is noted that it would introduce a distinction between IDNccTLDs and ASCII ccTLDs. In addition, it can be questioned whether invalidating a selected IDNccTLD is the most appropriate and optimal mitigation measure. At the same, it is noted that as a result the chances of misconnection are diminished.

The method and criteria used for the assessment cannot be determined only based on a linguistic and/or technical method of the string and its component parts, but also needs to consider and reflect the results of scientific research relating to confusing similarity, for example from cognitive neuropsychology. See for example:

- M. Finkbeiner and M. Coltheart (eds), Letter Recognition: from Perception to Representation. Special Issue of the Journal *Cognitive Neuropsychology*, 2009 and:
- Simpson, Ian; Mousikou, Petroula; Montoya, Juan; Defior, Sylvia, A letter visual-similarity matrix for Latin-based alphabets, Behavior Research Methods; June 2013, Vol. 45 Issue 2, p431
- Shane Mueller, Cristoph Weidemann, Alphabetic letter identification: Effects of perceivability, similarity, and bias, Acta Psychologica 139, (2012)

The last two studies were used as basis for the review methodology of the Extended Process Similarity Review.

[27] Please note that with respect to confusability SSAC emphasized in SAC089, which is a response in the context a proposals to amend the Fast Track EPSRP process (see:https://ccnso.icann.org/en/workinggroups/epsrp.htm)

"Confusability cannot be considered in isolation from other issues related to security. Phishing and other social engineering attacks based on domain name confusion are a security problem for end users. As such, adding a label to the root zone that is potentially confusable violates the Inclusion Principle's requirement that a TLD label be known to be 'safe'."

Note that SSAC's response and considerations were subsumed in and overtaken by the joint ccNSO-SSAC Statement to the ICANN Board form August 2017 (https://ccnso.icann.org/sites/default/files/field-attached/epsrp-final-response-17aug17-en.pdf)

[28] Based on Unicode Technical Report #36, Section 2: Visual Security Issues

6.2.3 Base for Comparison Confusing Similarity of IDNccTLD Strings.

Notes and Observations
With the introduction of variants one of the issues in the context of confusing similarity is to delineate the scope of the base for comparison for the confusing similarly validation process, as this scope could expand exponentially. For example, as part of the confusing similarity review a selected IDNccTLD string needs to be compared with the string "Pakistan" in the Arabic script. Applying this to the base of comparison the scope of the validation could expand to over 1200 strings (assuming all allocatable and blocked variants of "Pakistan" in the Arabic script are included).

The base for comparison is understood to mean the set of requested strings (Request Side) that will have to be compared with the set of potential visual confusingly similar strings (Comparison Side). Therefore, delineating the scope of the base for comparison effectively means delineating the scope of the Request Side and the Comparison Side.

As stated, proper delineation is needed for the following reasons:

- **Scalability -** The scale of the visual similarity review will have to be manageable as it is assumed that the confusing similarity reviews must done manually in the upcoming years. Without proper limitation, the review may become to resource intensive and/or long in duration, which may additional issues, for example around predictability.
- **Avoiding unforeseen and/or unwanted side effects.** If the full set of blocked variants of a would be included in the Comparison Side, a requested selected IDNccTLD could be "invalid" and further processing terminated although the variant string included in the Compare Side is from another script, and co-mingling of scripts is not allowed. In other words, the comparison may include strings/labels, which are not allowed under policy. If a string is comprised of or contains blocked variants it will never be delegated.
- **Likelihood of Misconnection-** Considering the goal of the confusing similarity validation, to minimize **the risk to the stability and security of the DNS due to user confusion by exploiting potential visual confusing similarity between domain names (e.g.,** be **in Latin script vs** бе **in Cyrillic)** the confusing similarity validation process is focused on the avoidance **MISCONNECTION** resulting from visual similarity of strings.

In SAC 060, SSAC advised ICANN (i.e., the policy making bodies) that *should they decide to implement safeguards to deal with failing user expectations due to the introduction of variants, a distinction should be made between two types of failure modes:* ***no-connection*** *versus* ***misconnection*** *(emphasis added)"*

No-connection may be a nuisance for the user, like a typo, however misconnection may result in the exploitation of the user confusion, and this could be avoided though the similarity review.

Therefore, the confusing similarity review is about minimizing the risk i.e., likelihood of misconnection. As stated, the confusing similarity validation is about the avoidance of MISCONNECTION and related harm. For MISCONNECTION to arise it "*must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion*" (This is standard used in the Fast Track by the EPSRP)

NO CONNECTION is possible because of confusing similarity, but also for other reasons and is a nuisance, but avoiding no connection is not the purpose of the similarity validation process.

6.2.3.A Delineating the Scope of Request Side

Introduction. The primary question to determine the scope of the Request Side is which set of variants should be taken into consideration when considering a request for a selected string and requested Delegatable variants?

Note that according to section 5.2.3. Limitation of delegation of variants above, only a selected IDNccTLD string and its requested Delegatable variants are eligible to be requested and delegated. However, the set of strings to consider could be:

1. Only the selected string and the requested Delegatable variants
2. The selected string and all Delegatable variants
3. The selected string and all Allocatable variants of the selected string, or
4. The selected string and all variants (Allocatable and Blocked)

Proposed Request Side. The request side for the Base for Comparison is comprised of and should always include the:

- Selected string, and
- Requested Delegatable variants (only those allocatable variants, which are a meaningful representation of the name of the territory in the designated language and related script and requested at the time of submission of the request)

Notes and Observations
The IDN selection process is open and ongoing. Variants may be requested any time if they meet all criteria, including meaningfulness.

The focus should be minimizing the risk of Misconnection to minimize and/or mitigate harm. Abstracting from variants, if the selected string "X X" is considered confusingly similar with the string "*xx* ", which belongs to the pool of:

- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters (letter [a-z] codes),
- Existing TLDs or reserved names.
- Proposed TLDs which are in process of string validation

The potential misconnection results from this confusing similarity between "X X" and "*xx"* and for that reason "X X" is deemed to be invalid and processing under the policy will end.

From a technical point of view each selected string and all its variants should be viewed as separate TLDs the selected sting "X X" and its Delegatable variants should be viewed as separate TLDs. Therefore, each of the requested strings should be reviewed on confusing similarity.

As the IDNccTLD process is open and at a later stage additional Delegatable variant strings may be requested (for example variants of already delegated IDNccTLD under the Fast Track process). Each of these requested variants of an already delegated selected string, should be reviewed at its own merits with respect to confusing similarity and the other requirements.

Secondly, the Similarity Evaluation Panel may include additional variants of the basic set of strings in the set of request side (including other non-delegatable allocatable variants and/or blocked variants), factoring in:

- The likelihood of misconnection
- Scalability, and
- Unforeseen and/or unwanted side effect.

In its report, the Panel must provide its reasoning for including or excluding additional variants of the basic set, and, if so, which were included (see section 7.4.2.3)

Notes and Observations

As stated in the Initial Report of the WG, the WG considered and develop the policy proposals on the SSAC advice in SAC060: when introducing variants, the policy making bodies should consider*, a distinction should be made between two types of failure modes:* ***no-connection*** *versus* ***misconnection.*** No-connection may be a nuisance for the user, like a typo, however misconnection may result from user confusion, and this could be avoided though the similarity review.

Following public comments (see Part C, Annex [insert number] the WG understands that under circumstances a mis-connection may result in situation where a user mistakenly recalls and uses a non-delegated variant of a delegated TLD and hence mis-connects with a TLD. This could be avoided if the similarity review, would include allocatable and blocked variants of the requested ccTLD in the validation process.

The WG extensively discussed the likelihood of such a string of events, taking into account the special nature of the selected IDNccTLD strings and its allowable variants under this policy (meaningful representation of the name of a territory in script in which a designated language is expressed), scope of confusing similarity evaluation and inherent subjective nature of the validation.

However, the WG is of the view that given the unknow scope of confusing similarity issues due to the introduction of variants a conservative approach of the similarity evaluation is warranted. At the same time the possibility for a review of the outcome of the similarity evaluation on a case by case basis by the similarity review panel and/or risk mitigation panel, and the review of this and other recommendations pertaining to the confusing similarity validation as part of the first review of the effectiveness and impact of the policy recommendations and its implementation are considered safeguards against an overly conservative approach.

Additionally, the WG considered that by allowing the Similarity Evaluation Panel, to set the detailed scope of a specific evaluation, and requirement to provide a rationale for the scope of the review in a specific case, a nuanced approach would be achieved. This would allow the Similarity Evaluation Panel to take into account all relevant factors The outcome of the review and rationale would be setting the scope of the review and/or risk mitigation discussion.

6.2.3.B Delineating the Scope of Comparison Side.

Minimal scope of comparison side. Reiterating, the goal of the confusing similarity validation: The goal is to minimize **the risk to the stability and security of the DNS due to user confusion by exploiting potential visual confusing similarity between domain names** or to paraphrase in terms of SAC 060 (*Examining the User Experience Implications of Active Variant TLDs)* the goal is to minimize the risk of MISCONNECTION due to visual confusability of two strings.

The minimum scope of the Comparison Side - before the introduction of variants - was[29]:

- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters[30] (letter [a-z] codes),
- Existing TLDs or reserved names, or
- Proposed TLDs which are in the process of string validation.

After the introduction of the variants, the minimum set of strings in the Comparison Side, needs to be defined as:

- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters[31] (letter [a-z] codes),
- Existing TLDs, which shall also include the already delegated variants of the selected string or primary label and of reserved names.
- Proposed TLDs which are in process of string validation and their requested Delegatable or requested variant labels (however defined under the ccTLD and gTLD processes)

Secondly, it is proposed that the Similarity Evaluation Panel should determine which additional variants of the basic set of strings should be included in the Comparison Side, factoring in:

- The likelihood of misconnection
- Scalability, and
- Unforeseen and/or unwanted side effect.

In its report, the Panel must provide its reasoning for its determination, whether to include additional variants of the basic set of strings were included in the comparison side and if so, which (see section 8.4.2.3)

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[29] See section 5.5 String Confusion and Contention Fast Track Implementation Plan (https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf)

[30] International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

[31] International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

Notes and Observations section 6.2.3 A & 6.2.3 B

With respect to the minimal scope of the comparison it is noted that it includes all strings that:

1. Should never be delegated under any existing policy (the reserved names),
2. Should always be Delegatable because of other existing policy (ASCII two-letter country-code TLDs, RFC 1591)),
3. Have been delegated (existing TLDs and their delegated variants), and
4. Are in the process of validation at the time the request for the selected IDNccTLD and its requested Delegatable variants was submitted. This would include the variants of the selected IDNccTLD strings and new gTLD labels and their requested variants.

Rationale - By definition, variants of a selected IDNccTLD string or primary label are derived from the string or label through the RZ-LGR and are (visual) similar to the selected or primary string/label from the perspective of the community using the script. With respect to allocatable variants it is *"probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion."*

With respect to including blocked variants in the base for comparison - again - by definition BLOCKED variants of a selected IDNccTLD string or primary label are derived from the string or label through the RZ-LGR and are considered to be (visual) similar to the selected or primary string/label from the perspective of the community using the script. Therefore, blocked variants should be taken into considerations. However, depending on the script, and the requested selected IDNccTLD string and/or requested Delegatable variant(s), the likelihood of confusing similarity of the requested string and variants with blocked variants and hence MISCONNECTION will vary – ranging from very probable to maybe possible.

As noted with the example of "Pakistan" in Arabic, according to the relevant LGR, 1200 blocked variants have been identified. Checking against such a number manually is unscalable.

Therefore, suggesting a procedural approach, taking into account **Scalability**, Likelihood **of MISCONNECTION** and **Unforeseen and/or unwanted side effect** is warranted with respect to the visual confusion validation of selected IDNccTLD strings and the requested Delegatable variant IDNccTLD strings.

6. 2. 4 Sting contention rule - String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, such as, but not limited to:

- Requested delegatable variant IDN ccTLD strings against existing TLDs and reserved names;
- Requested (delegatable variant) IDN ccTLD strings against other requested IDN ccTLD strings;

and

- Requested IDN ccTLD strings against applied-for gTLD strings and related variants.

Although contentious situations between IDNccTLD requests and new gTLD applications are considered unlikely to occur, assessments of whether strings are considered confusingly like existing or applied-for new gTLD strings and their variants are made during the Similarity Validation for requested selected IDNccTLD strings and/or their eligible variants and in the Similarity Evaluation step envisioned in the next round of new gTLD applications.

The following supplemental rules provide the thresholds for solving any potential contention issues:

A. A gTLD application and/or related variants related that is approved by the ICANN Board will be considered an existing TLD in inter-process contention, unless it is withdrawn. Therefore, any other later application for a similar string (whether primary or related variant) is deemed to be invalid.
B. A validated request for an IDN ccTLD and/or requested delegatable variant will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string is deemed to be invalid.

For purposes of the above contention rules, an IDN ccTLD string request is regarded as validated once it is confirmed that the string is a meaningful representation of the name of the Territory and that the string has passed the Technical and Similarity Validation as described in sections 7.5 and 7.6.

Notes and Observations
The WG appreciates the comment from ICANN regarding the in situations where a requested IDN ccTLD string is requested during a gTLD round and the requested IDN ccTLD string and the applied-for gTLD strings are found to be similar by IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel.

It is the understanding of the WG that the GNSO IDN EPDP WG has suggested a procedural approach, which is like the approach included in the IDNccTLD Fast Track, which reads in section 5.5:

String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, such as:

- *Requested IDN ccTLD strings against existing TLDs and reserved names;*
- *Requested IDN ccTLD strings against other requested IDN ccTLD strings;*

and

- *Requested IDN ccTLD strings against applied-for gTLD strings.*

Contention situations between Fast Track requests and new gTLD applications are considered unlikely to occur. Assessments of whether strings are considered in conflict with existing or applied-for new gTLD strings are made during the DNS Stability Evaluation for Fast Track requests and in the Initial Evaluation step for new gTLD applications. The following supplemental rules provide the thresholds for solving any identified contention issues:

A. A gTLD application that is approved by the ICANN Board will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.
B. A validated request for an IDN ccTLD will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.

For the above contention rules, an IDN ccTLD string request is regarded as validated once it is confirmed that the string is a meaningful representation of the country or territory and that the string has passed the DNS Stability Evaluation as described in Module 4.

6.3 Review of Section 6.2 and section 7.6.4.3

Section 6.2 (6.2.1 to 6.2.4), and section 7.6.4.3 - specifically the scope of the comparison, role of the Similarity Evaluation Panel in determining the scope, and, the impact on validation of the selected IDNccTLD string - shall be a subject of the first review of the IDNccTLD string selection policy, as foreseen in Section 14 Review of policy for the selection of IDNccTLD strings.

Notes and Observations
Section 6.3 has been added following the extensive discussion on the scope of the request side. See Notes and Observations with respect to section 6.2.3.A above.

Section 7 - Validation of IDNccTLD Strings & Variant

7.1 Procedures for the submission of the selected string and related documentation

Unless otherwise stated the procedure for submission of a requested string is considered a matter of implementation.

Notes and Observations
To limit surprises and to assist parties with their submission, ICANN is advised to provide information, including pointing to tools to self-evaluate the requested string, prior to the submission. However, these tools and information shall never replace the assessment by the various panels.

7.2 Administrative Validation of selected string

After the requester has submitted a request for an IDNccTLD string, ICANN should at least validate that:

- The selected IDNccTLD refers to a Territory
- The selected string (A-label) does not exist in the DNS, nor is approved for delegation to another party,
- The selected string (U-label) contains at least one (1) non-ASCII character.
- The required A-label, U-label, and corresponding Unicode points to designate the selected IDNccTLD string are consistent.
- Variant labels requested for delegation are identified as allocable variant labels of the selected string using the latest version of RZ-LGR
- Documentation on Meaningfulness is complete and meets the criteria and requirements.
- Documentation on the Designated Language is complete and meets the criteria and requirements.
- Documentation to evidence support for the selected string is complete and meets the criteria and requirements and is from an authoritative source.

If one or more elements listed are not complete or deficient, ICANN shall inform the requester accordingly. The requester should be allowed to provide additional information, correct the request, or withdraw the request (and potentially resubmit later). If the requester does not take any action within 3 months after the notification by ICANN that the request is incomplete or contains errors, the request may be terminated by ICANN for administrative reasons and in accordance with section 10 below.

If all elements listed are validated, ICANN shall notify the requester accordingly and the Technical and Confusing Similarity Validation Process will be initiated (see section 7.3 below).

If ICANN staff anticipates issues pertaining to the Technical and String Confusion Review during its initial review of the application, ICANN staff is advised to inform the requester of its concerns. The requester will have the opportunity to either:

1. Change the selected string,
   or
2. Tentatively request two or more strings as part of the application including a ranking of the preference to accommodate the case where the preferred string is not validated,
   or
3. Withdraw the request,
   or
4. Continue with the request as originally submitted.

Notes and Observations
During the development of the policy the need for a review of ICANN decisions listed in section 7.2 was extensively considered. The general conclusion was that the decisions listed pertain to the validation of specific aspects of a IDNccTLD application i.e. whether a listed requirement is included in the request and/or properly documented.
The WG made the following observations:

- The validation procedure includes a mechanism for dialogue before a final decision becomes definite.
- ICANN is advised to make use of this mechanism to avoid mistakes and/or to clarify its initial, tentative findings to allow the applicant to adjust the application if necessary.
- The validation by ICANN is first and foremost an administrative check
- Finally, the same application could be resubmitted pointing out there was a mistake.

With respect to the specific validation steps the following was noted:

- The selected IDNccTLD refers to a Territory

ICANN Org is expected to validate that the Territory to which the IDNccTLD string refer(s), is included as a country, a subdivision, or other area of particular geopolitical interest listed in Section 3 of the 'International Standard ISO 3166, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes' [ISO 3166-1:2020] or, in some exceptional cases, e.g. grandfathered-in delegations, a country, a subdivision, or other area of particular geopolitical interest listed for an exceptionally reserved ISO 3166-1 code element (See Principle I).

The WG Considered this a completely administrative check AND should not be subject to review

- The selected string (A-label) does not exist in the DNS, nor is approved for delegation to another party,
- The selected string (U-label) contains at least one (1) non-ASCII character.
- The required A-label, U-label, and corresponding Unicode points to designate the selected IDNccTLD string are consistent.

These validation decisions are considered factual, objective statements and should not be subject to a review.

Notes and Observations continued

- Documentation on Meaningfulness is complete and meets the criteria and requirements. This requirement for validation refers to the requirements listed in section 1.2.5 (Documentation of the meaningfulness of the selected IDNccTLD string). Specifically, it needs to be validated that the required documentation is included in the application and meets the requirements listed in section 1.2.5. This validation decision is considered factual, objective statement. ICANN is not expected and should not be put int the position to decide whether a selected string is a meaningful representation of the name of a territory. Therefore, there is no need for a review.
- Documentation to evidence support for the selected string is complete and meets the criteria and requirements and is from an authoritative source.

This requirement for validation refers to the requirements listed in section 4.1 (Required support for IDNccTLD string) and 4.2 (Documentation of required endorsement / support/non-objection for selected string by Significantly Interested Parties).

This validation decision is considered a factual, objective statement: the documentation provided evidence support/endorsement/non-objection by the Significantly Interested Parties. In case this requirement is not met ICANN is expected to inform the applicant accordingly and request additional information if deemed necessary. ICANN is not expected and should not be put in a position to decide whether an IDNccTLD is supported by the Significantly Interested Parties. When in doubt the applicant should provide additional documentation within a specified, reasonable timeframe. Therefore, there is no need for a review.

Details of the verification procedures and additional elements, such as the channel of communication, will need to be further detailed. This is considered a matter of implementation.

7.3 Technical, RZ-LGR and Similarity Validation

The Details for the Technical, RZ-LGR and Similarity Validation process are considered a matter of implementation, considering, and building on the proposals below under section 7.3.1 – 7.8.6. With respect to the Technical, RZ-LGR and Similarity Validation it is noted that the procedures and Guidelines that were developed under the IDNccTLD Fast Track Implementation Plan, provide a tested and operational example.

Notes and observations
One of the factors that was extensively discussed was whether the similarity Evaluation Panel is expected to a standing panel. The WG noted that over time (since 2009) the number of IDNccTLD applications has declined. The WG also noted that maintaining a standing panel is very costly. Therefore, whether to appoint a standing panel, or use another method for establishing a panel of independent panelist, and optimal number of panelists, is considered a matter of implementation. The WG recognizes various factors, such as the operational implications and expenditures related to the panels, need to be considered to find an optimal solution. The WG also believes that finding such a solution is a matter of implementation.

The WG also notes that implementation details have been developed, tested, and reviewed and updated as part of the IDNccTLD Fast Track Process. It is therefore suggested that like this policy itself is based and considers the criteria and procedures developed under the Fast Track Process, the Technical, RZ-LGR and Similarity Validation process will follow the process as developed under the Fast Track Process.

The WG also notes that under the Fast Track Process the "Technical Panel" and "Similarity Evaluation Panel" were combined under the function of the DNS Stability Panel. Whether in future, under the ccPDP4 policy, the two Panels will be combined is a matter of implementation.

7.3.1 General description of Technical and Similarity validation

The goal of the Technical, RZ-LGR and Similarity Validation is to provide external and independent advice to the ICANN Board whether a selected string and/or its requested Delegatable variant(s) meet(s) the required technical and RZ-LGR criteria and is/are not considered to be confusingly similar.

If according to the final, definite outcome of the validation a selected string does not meet one or more of the technical criteria or RZ-LGR and/or is considered confusingly similar to another string, the requested IDNccTLD string is/ are deemed to be invalid and not eligible under this policy.

It is recommended that ICANN appoint the following external and independent Panels:

- **Technical Panel.** To validate the technical requirements under this policy are met (section 6.1.1), a "Technical Panel[32]" shall be appointed to conduct a technical evaluation of the selected IDNccTLD string.

- **Similarity Evaluation Panel.** To validate a string for string similarity, ICANN shall appoint an external and independent "Similarity Evaluation Panel" (Hereafter: SEP). The SEP shall conduct the Confusing Similarity evaluation of the string, including the determination of the scope of the Comparison Base.

[32] Or any other name ICANN would prefer.

The confusing similarity validation process is by definition, subjective in nature. Therefore, to determine the scope of the Comparison Side the Panel is expected to include at least one person who is familiar with the script in which the selected string is expressed.

Notes and observations
The person who is familiar with the script in which the selected string is expressed could for example be a member of LGR team for the script in which the requested string(s) is/are expressed.

Such a person should preferably be added to the Panel at or around the time the IDNccTLD string is submitted for validation, however in any case before the Panel will start with the validation procedure.

- **Similarity Review Panel.** To allow for a final confusing similarity validation an external and independent Similarity Review Panel (Hereafter: SRP) shall be appointed when a review is requested by the IDNccTLD requester, to validate that the selected IDNccTLD string is not confusingly similar.

  Due to the specific nature of confusing similarity and its inherent subjective assessment, the findings of the SEP are reviewed by an external and independent SRP, but only upon request by the IDNccTLD string requester. This SRP review of the requested IDNccTLD string is expected to use a different assessment framework. The "Similarity Review" is considered a specific review mechanism, not to be confused with the general ccTLD Review Mechanism (see section 13 below). It is expected that this Panel will not include members from one of the other Panels called for under this policy.

- **Risk Treatment Appraisal Panel.** To allow for an appraisal of the risk mitigation treatment if either or both the SEP and/or SRP have found that the requested string to be confusingly similar an external and independent Risk Treatment Appraisal Panel (Hereafter: RTAP) shall be appointed, when such an appraisal is requested by the IDNccTLD requester.

7.4 Procedures for Technical Validation & RZ-LGR validation

1. After completion of the ICANN staff validation of the request (see Section 7.2 above), ICANN staff will submit the selected IDNccTLD string to the "Technical Panel" for the Technical & RZ-LGR validation.
2. The Technical Panel conducts a technical string evaluation of the string and its variants submitted for evaluation. If needed, the Panel may ask questions for clarifications through ICANN staff.

3. The results of the evaluation will be reported to ICANN staff. In its report the Panel shall include the names of the Panelists and document its findings, and the rationale for the decision.

After being constituted, the Panel is expected to complete its evaluation and send its report to ICANN staff within 30 days after receiving the IDNccTLD string to be evaluated. In the event the Panel expects to need more time, and ICANN staff should be informed accordingly. ICANN staff shall then inform the requester.

If according to the technical validation the selected IDNccTLD string, and requested variants, if any, meet(s) all the technical criteria, the string is technically validated. If the selected IDNccTLD string fails to meet the technical criteria, the requested string, and the requested variants, if any, is/are not valid under the policy.

If according to the technical review the selected IDNccTLD string meets all the technical criteria, but one or more of the requested variants does not meet the technical criteria, only the requested variants that do not meet the technical criteria are not valid under the policy.

ICANN staff shall inform and notify the requester accordingly and section 10 below applies.

Notes and Observation.
If the selected IDNccTLD string does not meet the technical criteria, ICANN org and the requestor are strongly advised to review the results jointly and cooperatively, including the manner in which the relevant RZ-LGR has been implemented with the goal to clarify any issues. However, if after such a review the selected string remains to be determined "invalid", the selected IDNccTLD string shall not pass.

7.5 Procedures for confusing similarity validation

Introduction. As part of the validation process, external and independent advice to the ICANN Board is provided whether a selected string is not considered to be confusingly similar.

If according to the Confusing Similarity Validation, the selected IDNccTLDs string and/or its requested Delegatable variant(s) is/are considered confusingly similar, the requested IDNccTLD string(s) is/are not valid and hence not eligible under this policy.

To validate that the string(s) are not considered to be confusingly similar, the validation process includes the following procedures:

- **Similarity Evaluation.** The Similarity Evaluation is detailed in section 7.6 below.

- **Similarity Review.** The Similarity Review is detailed in section 7.7 below.
- **Risk Treatment Appraisal Procedure.** The Risk Treatment Appraisal is detailed in section 7.8 below

7.6 Similarity Evaluation – Procedural aspects

7.6.1 After submission of the requested IDNccTLD string(s) ICANN staff shall submit the selected IDNccTLD string to the Similarity Evaluation Panel (SEP) for the confusing similarity string evaluation.

Notes and Observation
It is expected that the requested IDNccTLD string(s) will be submitted to the SEP at the time or after completion of the Technical validation, depending on how ICANN will structure the validation procedures and panels.

7.6.2 The Panel shall conduct a confusability string evaluation of the string(s) submitted for evaluation. The Panel may ask questions for clarification through ICANN staff.

7.6.3 The results of the evaluation will be reported to ICANN staff. In the report the Panel will include the names of the Panelists, document the decision, and provide its rationale for the scope of the Comparison Side and the decision.

Where the string is confusingly similar the report shall at a minimum include a reference to the string(s) to which the confusing similarity relates and examples (in fonts) where the panel observed the similarity

ICANN staff shall inform and notify the requester accordingly.

Notes and observation
Under Fast Track Process the DNS Stability Panel will conduct its review and send its report to ICANN staff within 30 days after receiving the IDNccTLD string to be evaluated. In the event the Panel expects it will need more time, ICANN staff will be informed, and ICANN staff informs the requester accordingly. It is the expectation that under this policy the duration of evaluation by the SEP form submission to reporting will be in same order (approximately one month) and the SEP will inform ICANN staff if it needs more time. It is also expected that ICANN staff will inform the requester accordingly.

7.6.4 Results of the Similarity Evaluation

7.6.4.1 If according to the evaluation, the Panel does not consider the requested string(s) to be confusingly similar, the selected IDNccTLD and /or Delegatable variants is/are validated.

7.6.4.2 If according to the evaluation by the Panel the selected string and/or one or more Delegatable variant IDNccTLD string(s) presents a risk of string confusion with a (variant) (IDN)ccTLD string, which is associated with the same Territory as the requested IDNccTLD

string(s), this should be noted in the report. ICANN staff shall inform the requester accordingly.

If, within 3 months of receiving the report the requester shall confirm that:

(i) The intended manager and intended registry operator for the IDNccTLD and the ccTLD manager for the confusingly similar country code are one and the same entity; and

(ii) The intended manager of the IDNccTLD shall be the entity that requests the delegation of the IDNccTLD string; and

(iii) The requester, intended manager and registry operator and, if necessary, the relevant public authority, accept and document that the IDNccTLD and the ccTLD with which it is confusingly similar will be and will remain operated by one and the same manager, and

(iv) The requester, intended manager and registry operator and, if necessary, the relevant public authority agree to specific and pre-arranged other conditions with the goal to mitigate the risk of user confusion the IDNccTLD becomes operational;

then the IDNccTLD string is deemed to be valid.

If either the requester, intended manager or the relevant public authority do not accept these pre-arranged conditions within 3 months after notification or at a later stage refutes the acceptance, the IDNccTLD shall not be validated.

Alternatively, the requester may defer from this mechanism and use the review or risk mitigation procedure described below.

7.6.4.3 – Invalid String(s)- Request similarity review or Risk Mitigation

If according to the evaluation of the selected IDNccTLD string and/or variants, the selected string and/or one or more of the evaluated variant(s) is/are found to present a risk of string confusion, ICANN staff shall inform the requester, considering section 10 below.

The requester may call for a Similarity Review or Risk Mitigation Appraisal and may provide additional documentation and clarification referring to aspects in the report of the Panel. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN and include the additional documentation, if any, in the notification to ICANN. After receiving the notification from the requester, ICANN staff shall call on the Similarity Review Panel (SRP) or Risk Treatment Appraisal Panel (RTAP.

If the requester has not requested a Similarity Review or Risk Mitigation Appraisal within 3 months after ICANN the date of notification by ICANN, the selected string and/or requested variant(s) are deemed invalid and section 10 applies.

IDNccTLD strings, which were delegated prior to the date this proposed policy becomes effective, are not affected by section 7.6.4.3 if (a) Delegatable variant(s) of that IDNccTLD is/are requested and found to be confusingly similar.

Notes and Observations
For variants to be eligible for delegation, the policy tries to strike a balance between the legitimate need for variants of an IDNccTLD to avoid user confusion and the general responsibilities for the security and stability of the DNS by the need to limit proliferation of strings at the root level. To ensure this balance is maintained throughout the process, the review and/or risk mitigation process (7.7 and/or 7.8 below) should be available to review the assessment of the initial panel or to appraise risk treatment related to introduction of a selected IDNccTLD string and its Delegatable variants.

7.7 Similarity Review

7.7.1 Similarity Review Procedure

The SRP can be requested to conduct a second and final confusing similarity assessment of the requested IDNccTLD string if:

1) The selected IDNccTLD string is deemed to be invalid; and
2) The request for a Similarity Review is received by ICANN within three (3) months after ICANN's notification of the results of the Similarity Evaluation.

7.7.2 The SRP conducts its review based on the standard and methodology and criteria developed for it, and considering, but not limited to, the finding of the Similarity Evaluation Panel, and all the related documentation from the requester, including additional documentation submitted under section 7.6.4.3 above. The SRP may ask questions for clarification through ICANN staff.

7.7.3 The results of the SRP shall be reported to ICANN staff and will be publicly announced on the ICANN website. This report shall include the name of the SRP Panelists, document the findings of the SRP, including the rationale for the final decision, and in case of the risk of confusion a reference to the strings that are considered confusingly similar and examples where the panel observed this similarity.

If according to the Similarity Review, the SRP does not consider the string to be confusingly similar, the selected IDNccTLD and/or its requested variant(s) is/ are valid.

If according to the Similarity Review, the SRP considers the string to be confusingly similar, the selected IDNccTLD and/or its requested variant(s) is/ are invalid.

7.8 Risk Treatment Appraisal

7.8.1 The Objective of the Review of Risk Treatment Appraisal. The objective is to determine if the risk will be effectively mitigated i.e., that If the Similarity Evaluation or Similarity Review has determined that the requested string is confusingly similar in

uppercase only (and not in lowercase), the proposed mitigation measures reduce the risks associated with the confusing similarity to an acceptable level or threshold.

7.8.2 Base for Appraisal. The proposed mitigation measures should be evaluated in relation to the strings identified by the relevant panel (SEP or SRP) as confusingly similar to the requested string(s).

7.8.3 Standard of Appraisal. The RTAP Panel should consider the likelihood of confusing similarity with specific consideration of confusability from the perspective that any domain name may be displayed in either upper- or lower-case, depending on the software application and regardless of the user's familiarity with the language or script.

The proposed mitigation measures meet the objective of Risk Treatment Appraisal if:

- The requester has made clear how the risk management process and proposed mitigation measures meet the objective and criteria of the Risk Treatment. This should be evaluated together with the confusability findings.
- The residual level of risk, if any, due to the confusability of domain names is expected to be in the same range as which would occur by adding another IDNccTLD which has not been found similar to existing or reserved TLD.

7.8.4 Criteria to appraise the Risk Treatment proposals. To appraise whether the proposed risk mitigation meet the objective of the RTA, the proposed risk mitigation measures should be:

- **Proportionate.** The mitigation measures will be in proportion to risks identified. The higher the risks, the greater the mitigation measures will be required; conversely, lower mitigation measures will be a proportionate response to risks that are identified as low severity or low likelihood,
- **Adequate.** For each of the case(s), the measures should reduce the risk of user confusion arising from the potential use of the applied-for TLD to an acceptable level. The residual level of risk, if any, due to the confusability of domain names is expected to be in the same range as which would occur by adding another IDNccTLD which has not been found similar to existing or reserved TLD.
- **Self-contained.** The proposed mitigation measures can only apply to the registration policies of the applied-for TLD and do not assume any restrictions on the availability or registration policies of other current or future TLD labels.
- **Global Impact.** The proposed mitigation measures must have global applicability, and not apply to confusability within the intended user community only.

Notes and observations

The criteria to appraise Risk Mitigation proposals were develop by a joint ccNSO – SSAC working party. To test the Risk Mitigation proposals the working party conducted a case study*:* *https://www.icann.org/en/system/files/files/eu-greek-mitigation-measures-28feb19-en.pdf* . This case study, together with the related Guideline, provides the basis to interpret and implement details of the Risk Appraisal criteria and Risk appraisal procedure.

7.8.5 Conditions for Eligibility of the RTA. Only under the following set of conditions, a request for the RTA is eligible:

I. The SEP evaluation and - if reviewed by the SRP – the SRP review has determined that the requested string is confusingly similar in uppercase only.
II. The requester has filed a request for a review of its proposed mitigation measures within three months from the date the results from the SEP and/or SRP have been communicated to the requester.
III. In the request for the appraisal of proposed mitigation measures, the requester has included - at a minimum – a reference to the proposed, internationally recognized, and appropriate risk management and mitigation process the requester intends to use, and the related, proposed mitigation measures (hereafter the Risk Mitigation Plan or RMP).
IV. The IDNccTLD Manager, and if so, required the relevant public authority, commits to implement the proposed and agreed upon mitigation measures as of the moment the IDNccTLD becomes operational.

If the above conditions are met, the review and evaluation of the proposed methodology and related mitigation measures shall be undertaken by an independent panel (the 'RTAP Panel'), appointed by ICANN.

7.8.6 Result of Risk Treatment Appraisal.

The result of the RTA procedure is either:

A documented and consolidated recommendation from the RTAP, following consultations with the requester, confirming that:

a The requester has adopted an appropriate risk management methodology and framework;
b The mitigation measures are proportionate and adequate to treat the risk(s) identified by the SEP or SRP (as the case may be);
c The requester/ IDNccTLD manager has committed to implement the mitigation measures prior to or on launch of the IDNccTLD string(s);
d The requested IDNccTLD string(s) is/are considered valid.

or

A documented recommendation confirming the risk is not adequately treated, given the list of mitigation measures being proposed by the requester or IDNccTLD Manager and the requested IDNccTLD string(s) is/are considered invalid.

The RTAP's recommendation will be made public.

Section 8 - Publication of IDNccTLD string

After successful completion of the request validation procedure and the IDNccTLD string is valid according to both the Technical and String Similarity Validation procedures, ICANN shall publish the IDNccTLD String publicly on its website.

Section 9 - Completion of IDNccTLD selection process

Once the selected IDNccTLD string is published on the ICANN website, and the IDNccTLD selection process is completed, delegation of the IDNccTLD string may be requested in accordance with the current policy and practices for the delegation, transfer, and retirement of ccTLDs. ICANN shall notify the requester accordingly.

Section 10 - Change, withdrawal, or termination of the request

ICANN staff shall notify the requester of any errors that have occurred in the application. These errors include, but are not limited to:

- The selected string is already a string delegated in the DNS or approved for delegation to another party.
- Issues pertaining to the required documentation.
- The country or territory of the request does not correspond to a listing in the ISO3166-1 list.
- If in accordance with one, or both of the independent Validation procedure(s) the selected string is not valid.

If such errors emerge, ICANN staff should contact the requester, who should be provided the opportunity to:

- Amend, adjust, or complete the request under the same application in order to abide to the criteria,

  or
- Withdraw the request.

If the requester has not responded within 3 calendar months of receiving the notice by ICANN staff, the request will be terminated administratively.

Details of the procedures and additional elements, such as the channel of communication, will need to be further documented. This is considered a matter of Implementation.

Section 11 Delegation, Transfer, Revocation of IDNccTLDs

11.1.1 Delegation of an IDNccTLD must be in accordance with current policies, procedures, and practices for delegation of ccTLDs

Once the IDNccTLD string has been selected and the String Validation has been successfully concluded, the delegation of an IDNccTLD shall be according to the policy and practices for delegation of ccTLDs. This means that the policies and practices for delegation, transfer, revocation, and retirement of two-letter country code TLDs apply to IDNccTLDs.

11.1.2 Delegation of variant(s) of the selected IDNccTLD must be in accordance with current policies, procedures, and practices for delegation of ccTLDs

All ccTLD related policies with respect to the delegation, transfer, revocation, and retirement of ccTLDs are applicable to the delegation, transfer, revocation and retirement of (Delegatable variant(s)) of the selected IDNccTLD. However, specific requirements under a related policy may vary for the selected IDNccTLD string and its variants.

If a selected IDNccTLD string is delegated under the existing relevant policy for delegation of ccTLDs, the whole set of Delegatable IDNccTLD variants shall be delegated to the same entity, based on the request for delegation of the selected IDNccTLD string, unless otherwise foreseen under this policy.

If a selected IDNccTLD string is requested to be transferred to another entity in accordance with RFC1591 as interpreted by the FoI or later version of the policy, the whole set of allocatable IDNccTLD strings shall be transferred to the same other entity, based on, and following the request for transfer of the selected IDNccTLD string, unless otherwise foreseen under this policy.

If a selected IDNccTLD string or any of its Delegatable variants is revoked in accordance with RFC1591 as interpreted by the FoI, all Delegatable variant IDNccTLDs (delegated or ~~withheld~~ for future delegation) shall be revoked.

If the selected IDNccTLD string should be retired as foreseen under this policy, all delegated variant IDNccTLD strings shall be retired, unless otherwise foreseen under this policy.

Implementation of this and other recommendations pertaining to variant IDNccTLD strings is considered a matter of implementation.

11.1.3 All delegated variant IDNccTLD strings must be operated by the same entity. If a specific IDNccTLD is operated by the IDNccTLD Manager all variants must be operated by the

same IDNccTLD Manager (Definition: the IDNccTLD Manager is the entity or organization listed in the IANA root zone database as the ccTLD Manager for a specific IDNccTLD).

If a selected specific a IDNccTLD is operated by a ”back-end” registry service provider under arrangement with the IDNccTL D Manager or will be operated by a “back-end” registry service provider under arrangement with the IDNccTLD Manager, that “back-end” service provider must operate all delegated variants of that IDNccTLD.

Notes and observation
The concept “same entity” is not defined. What is considered an entity or organization varies across the various national legal systems, policies, business practices, etc. For ccTLD managers this concept is detailed in Section 10.4 (a) of the ICANN Bylaws: *“(For purposes of Article 10) a ccTLD manager is the organization or entity responsible for managing a ccTLD according to and under the current heading “Delegation Record” in the Root Zone Database, or under any later modification, for that country-code top level domain”*

Section 12 – Deselection of IDNccTLDs and related variants

12.1 General Deselection of the IDNccTLD and its related variants. If an entry of a Territory is removed from the ISO3166 because it is divided into two or more new Territories, or two or more Territories have merged, the removal is considered a "trigger event" and causes the initiation of the process for the retirement of all the selected IDNccTLD(s) and – if applicable - their variants, which are a meaningful representation of the name of the Territory.

If the name of a Territory is removed from the ISO3166 because it is divided into two or more new Territories or two or more Territories have merged, the removal is considered a "trigger event" and causes the initiation of the process for the retirement of all the selected IDNccTLD(s) (and their variants), which are a meaningful representation of the name of the **Territory**. However, if a selected IDNccTLD string is a meaningful representation in the Designated Language of the merged Territory, and the Significantly Interested Parties of the "merged" Territory support the IDNccTLD, it should not be retired. Note that the basic criteria only one (1) IDNccTLD string per Designated Language applies (section 3.2.3 above). So, if there is already a IDNccTLD for the merged territory in the same Designated Language, the IDNccTLD of the Territory that is subsumed in the other Territory shall need to be retired.

Notes and Observations
Note 1. The case that the deselection of an IDNccTLD and its variants is the result of the removal of the name of the Territory from the ISO3166 is excluded from the review process. The decision to remove the name of a territory from the ISO3166-1 is an external decision (ISO3166-MA).

Rationale: The circumstance leading up to the removal of a line item should not be subject to a review. This reflects the basic understanding that *IANA (read ICANN) is not in the business of determining what is and what is not a country (read Territory)* and further the understanding that ISO has a process to do so.

12.2 Impact change of name of the Territory. The general policy requirement is that an IDNccTLD string must be a Meaningful Representation of the name of a Territory. The principle underlying the representation of Territories in two letter (ASCII) code elements is the visual association between the names of Territories (in English or French, or sometimes in another language) and their corresponding code elements.

The principle of association between the IDN country code string and the name of a Territory must be maintained: a selected IDNccTLD string must be a meaningful representation of the name of the Territory and hence If the selected IDNccTLD string is no longer a (visual) association with the name of the Territory should be deselected.

The IDNccTLD will be considered deselected and should be retired when it is evidenced that a selected and /or delegated IDNccTLD string is no longer a Meaningful Representation of:

a) The name of the Territory in the Designated language of the Territory,
b) Part of the name of the Territory in the Designated language of the Territory that denotes the Territory, or
c) The short-form designation for the name of the Territory in the Designated language of the Territory (for example the two-letter or three-letter country code transliterated into the Designated Language).

The deselection of an IDNccTLD string is evidenced as follows:

1. If the meaningfulness requirement at the time of the delegation of the string was verified by listing of (part of the name) in the Designated Language of the Territory in the UNGEGN Manual, the name of the Territory in the Designated Language is no longer included.

2. If the meaningfulness was substantiated by providing documentation from an internationally recognized expert or organization[33], by documentation or a statement of a similar, internationally recognized expert or organization that the selected string no longer denotes the name nor is a short-form designation for the name of the Territory in the Designated language of the Territory (hereafter: Statement of (dis-)association or if such a statement cannot be provided within a reasonable time (3 months) upon request of ICANN.

Confirmation of association or dis-association.
ICANN is not expected to actively seek confirmation of association or dis-association of an IDNccTLD string with the name of the Territory.

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[33] Note already included): ICANN should recognize and accept documentation from one of the following experts or organizations as internationally recognized:

- National Naming Authority – A government recognized National Geographic Naming Authority, or other organization performing the same function, for the Territory for which the selected string request is presented. The United Nations Group of Experts on Geographical Names (UNGEGN) maintains such a list of organizations at: https://unstats.un.org/unsd/geoinfo/ungegn/publications.html [unstats.un.org]
- National Linguistic Authority – A government recognized National Linguistic Authority, or other organization performing the same function, for the Territory for which the selected string request is presented. In the exceptional circumstance where there is no access to a National Naming Authority nor to a National Linguistic Authority for the Territory**,** assistance may be requested from ICANN to identify and seek reference to an expert or organization to provide the required documentation. This documentation will be considered acceptable and sufficient to determine whether a string is a Meaningful Representation of a Territory name.
  See section 1.2.5.

However, if ICANN receives a valid request[34] for an IDNccTLD string for a Territory which is in the same Designated Language and related script as an IDNccTLD string associated with the same Territory that is either in the verification process or has been delegated, ICANN shall require a Statement of (dis-)association from the requester or IDNccTLD Manager of the first IDNccTLD string for the name of the Territory.

If such a Statement of (dis-)association cannot be provided within a reasonable time frame (3 months upon notification by ICANN), the first IDNccTLD string is deemed to be deselected and shall be retired. As of the time a Statement of (dis-)association is requested until such a time the Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD strings for that Territory shall be put on hold.

If according to the Statement of (dis-)association the first requested IDNccTLD string or delegated IDNccTLD string is still associated with the name of the Territory as required, the latter requested IDNccTLD string shall be considered invalid, and the requester and the related government will be informed accordingly.

ICANN should include in the implementation plan an example of the documentation required i.e., an example of the Statement of (dis-) association.

12.3 Impact change of Designated Language. The general policy requirement is that to be considered an IDNccTLD string it must be a Meaningful Representation of the name of the Territory in a Designated Language of the Territory. For this purpose, a Designated Language is defined as: a language that has a legal status in the Territory or that serves as a language of administration[35].
The IDNccTLD will be considered deselected and should be retired if it is evidenced that a selected IDNccTLD string that is either in the validation stage or is delegated as an IDNccTLD is no longer a Meaningful Representation in a Designated Language of the Territory.

A language is evidenced to be no longer Designated:

- If at the time of the request of the IDNccTLD string the Designated Language requirement was demonstrated and verified by a reference to the listing of (part

[34] Note this includes documentation of support by the SIP!!

[35] The definition of Designated Language is based on: "Glossary of Terms for the Standardization of Geographical Names", United Nations Group of Experts on Geographic Names, United Nations, New York, 2002 https://unstats.un.org/unsd/ungegn/pubs/documents/Glossary_of_terms_rev.pdf . Note that in the Glossary the term "Official Language" is used. Experience has shown that, depending on the specific Territory, "Official Language" has a specific connotation, which sometimes creates confusion with the term "Official Language" as defined in the Glossary.

of the) name of the Territory in the Designated Language in the UNGEGN Manual, the name of the Territory is no longer included in the Designated Language (see for the relevant Territory as an ISO 639 language in Part Three of the "Technical Reference Manual for the standardization of Geographical Names", United Nations Group of Experts on Geographical Names (the UNGEGN Manual) (https://unstats.un.org/unsd/geoinfo/ungegn/docs/11th-uncsgn-docs/E_Conf.105_13_CRP.13_15_UNGEGN%20WG%20Country%20Names%20Document.pdf).

- If at the time of the request of the IDNccTLD string the Designated Language requirement was demonstrated and verified by referencing it as an administrative language for the relevant Territory as defined in section 3.7 of ISO 3166-1 standard [2020], the language is no longer referenced as such.

- If the relevant public authority in the Territory confirms that the language is no longer used in official communications of the relevant public authority or serves as a language of administration (Statement of Designation of Language)

If it is evidenced that a language is no longer a Designated Language in the Territory the related IDNccTLD string for the name of that Territory is considered deselected and if delegated, the IDNccTLD must be retired.

Confirmation of association or dis-association.
ICANN is not expected to actively seek confirmation of change of status of a language in Territory.

However, if ICANN receives a valid request[36] for an IDNccTLD string for a Territory which is in the same Designated Language as another IDNccTLD string associated with the same Territory and the latter is either in the verification process or has been delegated, ICANN shall require a Statement of Designation of Language from the requester or IDNccTLD Manager of the IDNccTLD string being verified or delegated (whatever the case may be). The Statement of Designation of Language must be provided by a similar relevant public authority that provided the original documentation.

If such a Statement of Designated Language cannot be provided within a reasonable time frame 3 months upon notification by ICANN), the IDNccTLD already in process of being verified string or already delegated, is deemed to be deselected and shall be

[36] Note this includes documentation of support by the SIP as described in section 4.

retired. As of the time a Statement of Designated Language is requested until such a time the Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD string for that Territory shall be put on hold.

If according to the Statement of Designated Language the language remains to be a Designated Language, the (second) requested IDNccTLD string in the same Designated Language of the Territory shall be considered invalid and the requester and the related government should be informed accordingly.

ICANN should include in the implementation plan an example of the Statement of Designated Language.

12.4 Impact change of script or writing system.

The general policy requirement is only one (1) IDNccTLD string per Designated Language. If there is more than one Designated Language in the Territory, one (1) unique IDNccTLD for each Designated Language may be selected, provided the Meaningful Representation in one Designated Language cannot be confused with an existing IDNccTLD string for that Territory.

Further, where a language is expressed in more than one script in a Territory, then it is permissible to have one string per script, although the multiple strings are in the same Designated Language. For that matter the documentation to request an IDNccTLD string must include a reference to the script or scripts in which the Designated Language is expressed, and which MUST be listed in the script charts of the latest version of UNICODE.

If it is evidenced that in the Territory a Designated Language is no longer expressed in the script or scripts in which the IDNccTLD string associated with the Territory was expressed at the time it was requested, then that IDNccTLD string shall be considered deselected and if delegated, must be retired.

Confirmation of script to express Designated Language. ICANN is not expected to actively seek confirmation of change of status of the script in which a Designated Language in Territory is expressed.

However, if ICANN receives a valid request[37] for an IDNccTLD string for a Territory which is in the same Designated Language as another IDNccTLD string associated with the Territory but is expressed in another script, ICANN shall require a Statement of

[37] Note this includes documentation of support by the SIP as described in section 4.

Referenced Script from the requester or IDNccTLD Manager of the IDNccTLD string already being verified or delegated (whatever the case may be). The Statement of Referenced Script must be provided by a similar relevant public authority that provided the original documentation with respect to the referenced script.

If such a Statement of Referenced Script cannot be provided within a reasonable time frame 3 months upon notification by ICANN), the IDNccTLD already in process of being verified string or already delegated, is deemed to be deselected and shall be retired. As of the time a Statement of Referenced Script is requested until such a time the Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD string for that Territory shall be put on hold.

If according to the Statement of Referenced Script the Designated Language remains to be expressed in the script originally referenced, the (second) requested IDNccTLD string in the same Designated Language of the Territory shall be considered invalid and the requester and the related government should be informed accordingly.

ICANN should include in the implementation plan an example of the Statement of Referenced Script.

12.5 The selected IDNccTLD string becomes contentious within the Territory.

The general policy requirement is that the selected IDNccTLD string must be non-contentious within the Territory. The non-contentiousness is evidenced by a statement of support/endorsement/non-objection by the Significantly Interested Parties (SIP) in the Territory.

If it is evidenced that the selected IDNccTLD string has become contentious within the Territory, it shall be retired in accordance with the policy for retirement of ccTLDs.

The contentiousness of the IDNccTLD string is evidenced by a statement of the Significantly Interested Parties in the Territory the IDNccTLD string is contentious (Hereafter: Statement of Deselection).

For purposes of the procedure, the definition of Significantly Interested Parties (section 4.2.1), and Classification of input (section 4.2.2) apply.

To be effective, the Statement of Deselection must be published on the ICANN Website. Prior to publication of the Statement, the IDNccTLD Manager shall be informed by ICANN of receipt of such a Statement of Deselection.

If a concurrent SIP statement in support of the IDNccTLD string(s) is received by ICANN before the Notification of Retirement is provided to the Manager of the deselected IDNccTLD string, this SIP Statement and the Statement of Deselection shall be deemed to be conflicting within the Territory. Before any further steps are taken in the retirement process, this issue needs to be resolved in Territory.

If a request for an IDNccTLD string in the same Designated Language for the same Territory is received at the same time or after the Statement of Deselection is received, but before the date the Notification of Retirement is sent, then the issue of contradicting statements with respect to the deselection of the IDNccTLD string needs to be resolved in Territory, before any further steps are taken in the deselection process of the delegated IDNccTLD string and/or validation process for the newly requested IDNccTLD string.

Notes and observations
ICANN should include in the implementation plan an example of the documentation required to demonstrate the support for the Deselection of the selected string(s).

12.6 Review Mechanism. The Review Mechanism for IANA Function Operator decisions is available to the IDNccTLD Manager who receives a Notification of Retirement under section 12.2, 12.3 or 12.4, and 12.5. when the Review Mechanism becomes available.

Section 13 - Applicability of cc Review Mechanism

13.1 Decisions subject to the cc Review Mechanism. Some proposals may – after adoption and implementation - result in an ICANN decision to deselect an IDNccTLD string and/or its variants, and hence to retire an IDNccTLD or its variants. According to the ccTLD retirement policy (as adopted in September 2022), the retirement of an (IDN)ccTLD requires the IFO to serve a Notice of Retirement to the (IDN)ccTLD Manager. This Notice formally starts the (clock of the) ccTLD retirement process.

Similar as under the proposed ccPDP3 Review Mechanism policy – if a ccTLD Manager is directly impacted by a Notice of Retirement for two-letter Latin ccTLD which does not correspond to an ISO 3166-1 Alpha-2 Code Element - it is proposed that the review mechanism should be available to an IDNccTLD Manager who is served a Notice of Retirement following the deselection of an IDNccTLD string and/or its variants strings resulting from:

- Change of Name of the Territory, Change of designated language, Change of script or writing system (section 13.2, 13.3 and 13.4)
- Impact IDNccTLD string becomes contentious within the Territory (Section 13.5)

13.2 Non-applicability IRP/Reconsideration

In July 2022 the ccNSO Council requested that the ccPDP4 WG look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii), and, if clarification is needed, make a recommendation to that effect.

The ccPDP 4 WG makes the following recommendations regarding ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii):

- As IDNccTLDs are ccTLDs, all disputes and claims related to the delegation, transfer, and revocation of IDNccTLDs, shall remain excluded from ICANN's Reconsideration Process and the Independent Review Process for Covered Actions (IRP).
- As IDNccTLDs are ccTLDs, all disputes and claims related to the retirement of an IDNccTLD shall be excluded from ICANN's Reconsideration Process and the Independent Review Process for Covered Actions.
- It is recommended that the relevant section of the ICANN Bylaws shall be amended accordingly, including but not limited to amending the terms "delegation and re-delegation" to "delegation, transfer, revocation and retirement", and if considered advisable for avoidance of doubt, replace "ccTLDs" with "ccTLDs and IDNccTLDs" Amendment of the Bylaws is considered a matter of implementation.
- The ccNSO is advised to consider that any future policy to be developed by the ccNSO and which can affect the stewardship of a ccTLD, including an IDNccTLD, should include a consideration whether claims and disputes flowing from the application of the policy should be excluded from ICANN's Reconsideration Process and the

Independent Review Process for Covered Actions, and if so, explicitly specify the outcome of this consideration in any such policy.

Section 14 - Miscellaneous

14.1. Confidentiality of information during validation process, unless otherwise foreseen.

It is recommended that the information and support documentation for the selection of an IDNccTLD string is kept confidential by ICANN until it has been established that the selected string meets all criteria. However relevant information will have to be shared with the external panels as foreseen in section 7 above, and the similar panels for new gTLD applications for purpose of conducting their business. Further details are considered a matter of implementation.

Notes and Observation
As stated in section 7.2 (Administrative Validation of the selected string, it is assumed that if one or more elements of the request are not complete or deficient, ICANN shall inform the requester accordingly, and the requester should be allowed to provide additional information, correct the request, or even withdraw it. To allow this dialogue to take place, it is recommended that information is kept confidential as under the Fast Track Process, and like the handling of ccTLD delegation transfer and IANA Function related requests.

This section was amended following the discussion of the public comments received. The WG appreciated the concern of ICANN resulting from the need to keep information and support documentation confidential up and until it has been established that the selected string meets all criteria.

The WG also notes that this concern was addressed for the a*ssessments "during the DNS Stability Evaluation for Fast Track requests and in the Initial Evaluation step for new gTLD applications" (see section 5.5 FIP and below).*

The WG suggests that ICANN may use a comparable method going forward, which is considered a matter of implementation.

14.2. Transitional arrangement regarding IDNccTLD strings under the Fast Track IDNccTLD Process

1. **Closure of Fast Track Process.** At the moment ccPDP4 has been fully implemented and operational for processing requested selected IDNccTLD strings, the Fast Track Process must be closed. As of the date the ccPDP4 becomes operational, new requests for a selected IDNccTLD string or requests for variant IDNccTLD strings must be processed through the implemented ccPDP4 policy.
2. If at the time the IDNccTLD request process based on ccPDP4 becomes operational, an IDNccTLD string requests is still in process under Fast Track Process, the processing of the request must be completed through the Fast Track Process. Completion results either in publication of the selected IDNccTLD string in accordance with section 5.6.4 of the Fast Track Implementation Plan, or results in the withdrawal of the request by the requestor or in termination of

the request by ICANN in accordance with section 5.4 of the Fast Track Implementation Plan[38].

3. All IDNccTLD strings that have been validated under the Fast Track Process, will be deemed to be validated under the ccNSO policy for the selection of IDNccTLD strings, and are grandfathered. The recommendations under this policy development process with respect to the deselection of IDNccTLD strings shall be applicable to the grandfathered IDNccTLD strings.

14.3. Review of policy for the selection of IDNccTLD strings.

It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances. It is also recommended that the ccNSO Council initiates such a review by launching a review group who will be tasked to review the ascertain whether the policy needs to be updated and advise the ccNSO Council on the proposed method for such an update. The scope and working method of such a review must be determined by the ccNSO after consulting relevant stakeholders, and consider the experience with the ccPDP4 process and relevant circumstances and developments with respect to IDN TLDs

In the event such a review results in a recommendation to amend the policy, the rules relating to the country code Policy Development Process as defined in the ICANN Bylaws should apply.

14.4. Verification of Implementation

It is anticipated that some parts of the recommendations and process steps will need to be further refined and interpreted by ICANN staff before they will be implemented. It is further anticipated that this will be done through an implementation plan or similar planning document. It is therefore recommended that the ccNSO monitors and evaluates the planned implementation of recommendations and the ccNSO Council reviews and approves the final planning document before implementation by staff.

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[38] https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf . From the FIP: "*Several of the steps in the Request Submission for String Evaluation (Stage 2) allow for a requester to withdraw a request. It is also possible that ICANN will terminate a request if the request contains certain errors. "*In addition, several circumstances are listed in the FIP, which trigger a termination by ICANN, for example, according to Section 5.6.3 "*If the requester has not notified ICANN within three (3) calendar months after the date of notification by ICANN of DNS Stability Panel findings, the Termination Process will be initiated. See section 5.4 "*

14.5. Review of the IDNccTLD Fast Track Process

With respect to the update of the Fast Track Process Implementation Plan, the ccNSO has requested a standstill of the evolution of the Fast-Track process. See letter ccNSO to the ICANN Board of Directors and response from the Chair of the Board.

This approach is supported and the evolution of the Fast-Track Process, if at all, should be limited to address issues that cause a demonstrable threat to the security and stability of the DNS, and to be resolved require an amendment of the Fast-Track Process before completion and implementation of the envisioned ccPDP4.

Part B - Advice to IDNccTLD Managers

Section 1 - Advice to IDNccTLD Managers with respect to submission of IDN Tables

Need to advise ccTLD Managers with respect to IDN Tables.

The variant management subgroup agreed that it should be determined whether an issue is relevant and if so, whether it should be addressed through a policy proposal or - if considered out of the policy scope - should be considered advice to ccTLD managers, with a link to background material regarding the topic. To do so, the group will first decide whether a topic/issue should be addressed and if so, it is considered as policy matter or the WG should /could and advise and include a reference to the background material. Implementation of the advice is not mandatory but expected. The goal is to ensure that ccTLD Managers and others involved in IDNs are aware of issues, risks, and potential solutions to address the issues or mitigate the risks.

The WG notes that according to the current Guideline for the Implementation of Internationalized Domain Names[39] (hereafter: IDN Guideline), "*Top-level domain ("TLD") registries supporting Internationalized Domain Names ("IDNs") will do so in strict compliance with the requirements of the IETF protocol for Internationalized Domain Names in Applications*." (Currently, May 2022, IDNA 2008).

According to RFC 7940[40] LGRs are "*algorithms used to determine whether, and under what conditions, a given identifier label is permitted, based on the code points it contains and their context. These algorithms comprise a list of permissible code points, variant code point mappings, and a set of rules that act on the code points and mappings. LGRs form part of an administrator's policies. In deploying Internationalized Domain Names (IDNs), they have also been known as "IDN tables" or "variant tables"."*

The variant management subgroup notes that the term "IDN Table" may give rise to misunderstandings. The procedures or policies which are currently referred to as "Label Generation Rulesets[41]" (LGRs), were historically referred to as "IDN tables" or "variant tables." Currently (May 2022) and under this policy, the term "IDN Table" or "IDN Tables" is

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[39] At the time of writing this document Version 4.1 was adopted by the ICANN Board of Directors in September 2022. See: https://www.icann.org/resources/board-material/resolutions-2022-09-22-en#2.d . According to the introduction of version 4.1: "For other registries (e.g., Country Code TLD registries) this document is intended as the best current practice."

[40] see: https://www.rfceditor.org/rfc/pdfrfc/rfc7940.txt.pdf

used in the context of second and lower-level registration policies. For Top Level Domains the term “Root Zone -Label Generation Ruleset” or “RZ-LGR” is used.

The subgroup WG further notes that the scope for ccNSO developed policies is limited and excludes ccTLD registration policies. The WG also notes the statement in draft[42] IDN Guideline version 4.0 that the IDN Guideline version 4.0 is intended as the best current practice for Country Code TLD registries.

Finally, the WG notes in this context that under the proposed policy for selection of IDNccTLDs under the Overall Principle to *Preserve security, stability, and interoperability of the DNS, it is stated that to the extent different and/or additional rules are implemented for IDNccTLDs, these rules should:*

a. ……
b. Ensure adherence with the RFC 5890, RFC 5891, RFC 5892, RFC 5893
c. …….”

Advice to ccTLD Managers

To enhance adherence with the relevant RFCs and to inform TLD Operators, including but not limited to other IDNccTLD Managers and stakeholders, in a transparent and accountable manner, it is strongly suggested that IDNccTLD Managers are expected (but not required) to publish *repertoires of Unicode code points that are permitted for registration under the selected IDNccTLD string and/or its variants* (hereafter: IDN Table) and be guided by the Guidelines for the Implementation of Internationalized Domain Names applicable at the time. The IDN Table or Tables are expected to be published and included in IANA IDN Practices Repository in accordance with the relevant and applicable procedures at the time the selected IDNccTLD and/or its variant(s) is requested.

Further, it is expected that the registration of any domain name containing an unlisted code point will not be accepted.

If the same script/language combination is used in two or more Territories, cooperation between relevant parties in the relevant Territories is encouraged to define an IDN Table for that script/language combination. ICANN is advised either to facilitate these processes directly or indirectly.

The WG notes that according to the current (June 2022) IANA IDN Repository procedure, the purpose of the repository is to publish IDN Tables that have been verified as coming from representatives of domain registries. Therefore, the ultimate responsibility for the content of the IDN Table for an IDNccTLD is with the IDNccTLD Manager. However, to ensure

[42] In June 2022, IDN Guideline version 4.0 is a draft, pending adoption by the ICANN Board of directors.

consistency across IDN Tables for the same script and/or language/script combinations and hence ensure security and stability of the DNS, IDNccTLD Managers are encouraged that prior to submission ICANN is requested to review the design of the proposed IDN Table on adherence with the relevant and applicable IDN Guidelines version. The results of the review will be shared with the relevant IDNccTLD Manager(s) to allow adjustment of the design if deemed appropriate by the IDNccTLD Manager(s).

Section 2- Advice with respect to registrations under the IDNccTLD (variants) under management

Need for advice to ccTLD Managers with respect to registrations under IDNccTLD (variants).

The variant management subgroup agreed that it should be determined whether an issue is relevant and if so, whether it should be addressed through a policy proposal or - if considered out of the policy scope - should be considered advice to ccTLD managers, with a link to background material regarding the topic. To do so, the group will first decide whether a topic/issue should be addressed and if so, it is considered as policy matter or the WG should /could and advise and include a reference to the background material. Implementation of the advice is not mandatory but expected. The goal is to ensure that ccTLD Managers and others involved in IDNs are aware of issues, risks, and potential solutions to address the issues or mitigate the risks.

The subgroup further noted that the scope for ccNSO developed policies is limited and excludes developing and recommending ccTLD registration policies (ANNEX C ICANN Bylaws).

The WG notes in this context that under the proposed policy for selection of IDNccTLDs under the Overall Principle III **(**Section 2 above)
"Preserve security, stability, and interoperability of the DNS. To the extent different and/or additional rules are implemented for IDNccTLDs, these rules should:

(a) Preserve and ensure the security and stability of the DNS;
(b) ….
(c) ….

The basic policy premise of introducing variants is that a selected (IDNccTLD) string/label and its variants are one and the same. However, note that from a technical perspective a selected string/label and its variants are separate entries in the DNS[43].

[43] According to SAC060 (https://www.icann.org/en/system/files/files/sac-060-en.pdf) and reiterated in SAC120 (https://www.icann.org/en/system/files/files/sac-120-en.pdf): *"An IDN variant is an alternate code point (or sequence of code points) that could be substituted for a code point (or sequence of code points) in a candidate label to create a variant label that is considered the "same" in some measure by a given community of Internet users. There is no general agreement of what that sameness requires."* Further, according to SAC120: "*From a technical perspective, two strings that are delegated in the DNS are two different delegations just like any two other domain names. Variants are no exception."*

In various reports and studies[44] the following two issues have been identified, which both are driving the need to mitigate the risks associated with these issues:

- No Connection (Denial of Service)
- Misconnection

According to SSAC the second issue – Misconnection – *"causes worse results compared to denial of service because misconnection "presents issues of possible credential leakage, accidental disclosure of information, and user confusion and frustration". F*urther *"Confusability cannot be considered in isolation from other issues related to security. Phishing and other social engineering attacks based on domain name confusion are a security problem for end users"*

To maintain this basic policy premise and minimize the risk of user confusion and – related-security issues arising from diverging registrations i.e., arising from delegation of domain names that are deemed to be same to two different entities to be the same, the following risk mitigation measures are proposed:

Advice to ccTLD Managers
A Second Level string registered under a delegated variant IDNccTLD string is expected to be registered for the same entity under all other delegated variant IDNccTLD strings. If (multiple) IDNccTLD variant strings have been delegated, then a second-level domain name that is registered under one (of the variant) IDNccTLD string is expected to be registered for one and the same entity or withheld for possible future registration for that entity under all delegated IDNccTLD variant strings.

If a variant IDNccTLD string is delegated after the IDNccTLD has become operational this advice also applies under the newly delegated variant IDNccTLD string an already registered second level domain name under another variant IDNccTLD variant string is expected be registered or withheld for future registration for the same entity.

All variants of a Second-Level string registered under all delegated variant IDNccTLD strings are expected to be registered for the same entity under all IDNccTLD variant strings. Assuming multiple Delegatable variant IDNccTLDs strings have been delegated, and that for assuming a second level IDN domain name, which is in process of being registered under an IDNccTLD string a set of allocatable variant second level strings can generated by applying the IDN Table then the set of allocatable variant second level strings **are expected**

[44] See: SAC060, https://www.icann.org/en/system/files/files/sac-060-en.pdf
IDN Variant TLD Implementation: Risks and Mitigation, https://www.icann.org/en/system/files/files/idn-variant-tld-risks-mitigation-25jan19-en.pdf

to be either registered under all delegated IDNccTLD variant strings for one and the same entity or withheld for possible future registration under all delegated IDNccTLD variant strings for one and the same entity

All variants of a Second-Level domain name to be registered under a delegated IDNccTLD string <u>are expected</u> to be registered to the same entity. If for a second level string to be registered under a delegated IDNccTLD string a set of allocatable variant second level strings can generated by applying the IDN Table for second level strings under the IDNccTLD string, THEN the set of allocatable variant second level strings are expected to be either registered for one and the same entity or withheld for possible future registration for that entity

In addition, ICANN is strongly advised to introduce a mechanism as currently (September 2022) in use under the Fast Track that as part of the IDNccTLD request procedures a requester of the IDNccTLD commits to and/or ensures that the IDNccTLD managers commits to the advice.

The details of this commitment are considered a matter of local implementation

Note that the concept “same entity” is not defined. What is considered a “same” entity or organization varies across the different national legal systems, policies, business practices, etc. For reference and comparison: The concept ccTLD Manager is detailed in Section 10.4 (a) of the ICANN Bylaws: *“(For purposes of Article 10) a ccTLD Manager is the organization or entity responsible for managing a ccTLD according to and under the current heading “Delegation Record” in the Root Zone Database, or under any later modification, for that the country-code top-level domain”.*

Part C - Annexes

Annex A: Glossary of terminology used in policy proposal

Term	Definition/Description	Document, section
Territory, Territories	"Territory" or "Territories" are defined as a country, a subdivision, or other area of particular geopolitical interest listed in Section 3 of the 'International Standard ISO 3166, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes' [ISO 3166-1:2020] or, in some exceptional cases, e.g. grandfathered-in delegations, a country, a subdivision, or other area of particular geopolitical interest listed for an exceptionally reserved ISO 3166-1 code element. This definition of territory is included in Article 10 of the ICANN Bylaws for purposes of Article 10.	Initial Report Section 2 Principle I
Meaningful Representation	A country code string is considered to be a **Meaningful Representation** if it is: a. The name of the **Territory**; or b. Part of the name of the **Territory** that denotes the **Territory**; or c. A short-form designation for the name of the **Territory**, recognizably denoting the name.	Initial Report Section 4.2.1
Designated Language	A language that has a legal status in the or that serves as a language of administration	Initial Report section 4.2.2
Withheld-same-entity Variant	A Withheld label or string is set aside for possible allocation only to the same entity of the other labels in the variant set.	
Blocked Variant	A status of some label (string) with respect to a zone, according to which the label is unavailable for	Source document: IDN Variant TLD Implementation: Appendices Page 5

Term	Definition/Description	Document, section
	allocation to anyone. The term “to block” denotes the registry (the zone operator) taking this action.	
Allocatable or Allocated Variant	A status of some label (string) with respect to a zone, whereby the label is associated administratively to some entity that has requested the label. This term (and its cognates “allocation” and “to allocate”) represents the first step on the way to delegation in the DNS. When the registry (zone operator) allocates the label, it is effectively making a label a candidate for activation. Allocation does not, however, affect the DNS at all.	IDN Variant TLD Implementation: Appendices Page 5
Activated/Active	A status of some label with respect to a zone, indicating that there are DNS resource records at that node name; or else that there are subordinate names to that name, even though there are no resource records at that node name. In the case where there are resource records at the node name, any resource record will do. In the case where there are subordinate names but no resource records (except those to support DNSSEC), the label names an empty non-terminal. A registry (zone operator) setting the active status activates the name or performs activation.	
Delegation	Process to assign a ccTLD to a manager	https://www.iana.org/help/cctld-delegation
Delegatable IDNccTLD Variant	IDNccTLD string or variant eligible to be assigned to a ccTLD Manager if it is 1. an Allocatable Variants of the selected IDNccTLD string that is 2. Meaningful Representations of the name of the Territory in 3. a Designated Language	Initial Report Section 6.2.3
Delegated (technical definition)	A status of some label with respect to a zone, indicating that in that zone there are NS resource records at the label. The NS resource records create a zone cut and require an SOA record for the same owner name and corresponding NS resource records in the subordinate zone. The act of entering the NS records in the zone at the parent side of the zone cut is delegation, and to do that is to delegate.	IDN Variant TLD Implementation: Appendices Page 5

Term	Definition/Description	Document, section
	This definition is largely based on RFC 1034; the reader should consult RFC 1034 for detailed discussion of how the DNS is broken into zones.	
Withheld-same-entity	A Withheld label is set aside for possible allocation to only the same entity of the labels in the variant set	IDN Variant TLD Implementation: Appendices *Page 5*
Selected String or Selected IDNccTLD	The IDNccTLD that was selected in Territory and supported by the Significantly Interested Parties in the Territory to which the IDN country code relates. Primary of main IDNccTLD string that meets criteria of section 4.2	Initial Report Section 4.2
Rejected, non-Valid, or Invalid string	A Rejected string is set aside on administrative grounds outside the ordinary LGR procedures. Other terms used "Not Approved" and "Will Not Proceed". Strings that cannot be allocated on visual confusability grounds, based on the string similarity review step in the TLD application process, are also Rejected.	Initial Report Section 8.3
IDNccTLD Manager	IDNccTLD Manager is the entity or organization listed in the IANA root zone database as the ccTLD Manager for a specific IDNccTLD	Article 10. (a) ICANN Bylaws, https://www.iana.org/domains/root/db

Annex B. Terminology derived from the ISO 3166 Standard

Included is basic terminology related to the ISO3166 Standard. The included terminology was identified by the ccPDP3 Retirement WG in the context of developing the process for the retirement of ccTLDs. These terms may also be relevant in the context of ccPDP4.

Notes with respect to the terminology derived from the ISO 3166 Standard:

- In this overview a distinction is made between terminology defined in the 2020 edition of the Standard and the ISO Online Browsing Platform (OBP). The terminology defined in the Standard is included in the table in normal font. The terminology used in the Online Browsing Platform is *emphasized*.
- The definitions contained in the Standard are considered to take precedent over the terminology in the OBP (https://www.iso.org/glossary-for-iso-3166.html). Terminology from the Online Browsing Platform is only included for informational purposes. It is strongly advised not to use or refer to the terminology included in this Annex in Policy and policy related documents but check the relevant Standard.
- The 2020 version of ISO 3166 was published recently (2020). The major change is that the table of country codes is no longer part of the printed standard but online as part of the ISO Online Browsing Platform (https://www.iso.org/obp/ui#search). In addition, some of the definitions have been revised.

Term/Practice	Description	Defined in OBP?	ISO 3166 Standard:
Assigned (or allocated) code elements	The result of applying the principle of visual association between the country names (in English or French, or sometimes in another language) and their corresponding code elements.	No	Section 5.2: The principle behind the alphabetic codes in the code corresponding to this document is a visual association between the country names (in English or French, or sometimes in another language) and their corresponding code elements. In applying this principle, the code elements have generally been assigned on the basis of the short names of the countries, thus avoiding, wherever possible, any reflection of their political status. The distinguishing signs for road vehicles reported by the contracting parties to the Conventions on Road Traffic (1949 and 1968; see Reference [21]) provided the major source for code elements for the code

Term/Practice	Description	Defined in OBP?	ISO 3166 Standard:
			corresponding to this document.
Unassigned	*Code Elements that have not been assigned to country names.*	Yes	Mentioned in 3.10. status of alpha-2 country code element (in the OPB) information whether the code element is assigned, unassigned or reserved transitionally, exceptionally, or for an indeterminate period
Deletions from the list of country names	Deletions from the list of country names are made on the basis of information from the United Nations Headquarters, or upon the request of a member of ISO 3166/MA.	N	Deletions from the list of country names shall be made on the basis of information from the United Nations Headquarters, or upon the request of a member of ISO 3166/MA. The ISO 3166/MA shall decide upon deletion, on the basis of the information given. ISO3166-3 provides the list of country names deleted in this part of ISO 3166 since its first edition in 1974.
Reservation of or Reserved Code Elements	Some code elements are reserved. For a limited period when their reservation is the result of the deletion or alteration of a country name. For an indeterminate period when the reservation is the result of the application of international law or of exceptional requests.	Yes	Section 7.6 & 7.6.1
Reallocation Period	Some code elements are reserved for a limited period when their reservation is the result of the deletion or alteration of a country name. exceptional requests.		*Section 7.6.2 New text* Country code elements that the ISO 3166/MA has altered or deleted should not be reassigned during a period of at least fifty years after the change. The exact period is determined in each case on the basis of the extent to which the former code element was used.
Transitionally Reserved	*Codes that are reserved during a transitional period*	Yes	mentioned in 3.10. status of alpha-2

Term/Practice	Description	Defined in OBP?	ISO 3166 Standard:
	while new code elements that may replace them are taken into use. This results from changes in the standard.		country code element (in the OPB)
Period of Non-Use	Certain code elements existing at the time of the first publication of the ISO 3166 country codes and differing from those in current version of (ISO 3166-1) should not be used for an indeterminate period to represent other country names but included in the list of reserved code elements and should not be reallocated during a period of at least fifty years after the date the countries or organizations concerned have discontinued their use.		Section 7.6.2 Certain country code elements existing at the time of the first publication of the ISO 3166 country codes and differing from those in this part of ISO 3166 should not be used for an indeterminate period to represent other country names. This provision applies to certain vehicle designations notified under the 1949 and 1968 Conventions on Road Traffic. Code elements to which this provision applies should be included in the list of reserved code elements (see 7.6.5) and should not be reassigned during a period of at least fifty years after the date when the countries or organizations concerned have discontinued their use.
Exceptionally Reserved	*Codes that have been reserved for a particular use at special request of a national ISO member body, governments, or international organizations. For example, the code UK has been reserved at the request of the United Kingdom so that it cannot be used for any other country*.	Yes	Section 7.6.4 Code elements may be reserved, in exceptional cases, for country names which the ISO 3166/MA has decided not to include in the code corresponding to this document, but for which an interchange requirement exists. Before such code elements are reserved, advice from the relevant authority should be sought.
Reallocation	Before reallocating a former code element or a formerly reserved code element, the ISO3166/MA shall consult, as appropriate, the authority or agency on whose behalf the	No	Section 7.6.2. See the period of non-use entry

Term/Practice	Description	Defined in OBP?	ISO 3166 Standard:
	code element was reserved, and consideration shall be given to difficulties which might arise for the reallocation.		
Indeterminately Reserved	*A code that has been indeterminately reserved for use in a certain way. Usually this is justified by their presence in other coding systems. For example, several codes have been reserved by the World Intellectual Property Organization (WIPO)*	Yes	mentioned in 3.10. status of alpha-2 country code element (in the OPB)
Country Name	Name of country, dependency, or other area of particular interest		Section 3.4
Country Code	Listing of country names with their representations by code elements		Section 3.3
Code Element	The result of applying a code to an element of a coded set		Section 3.2
Code	Set of data		Section 3.1, changed definition: set of data transformed or represented in different forms according to a pre-established set of rules
Alpha-2 code	*A two-letter code that represents a country name, recommended as the general-purpose code*	Yes	
List of Country Names	*Officially Assigned Codes*	Yes	The list of country codes and names disappeared. The list is replaced with the ISO Open Browser Platform portal. and that is therefore there are definitions 3.xx in the standard

Term/Practice	Description	Defined in OBP?	ISO 3166 Standard:
Formerly Used Codes	*Codes that used to be part of the standard but that are no longer in use. See alpha-4 codes.*	Yes	Defined in Part 3, Section 3.3.3 **alpha-4 formerly used country code element** coded representation of country no longer in use

Annex C- Stress testing

Further, the stress test has been numbered through (for ease of reference).
Column: Discussed has been updated.

Eligibility of Application

Item #	Scenario	Assessment	Adjust proposed policy?	Adjusted section in text Initial Report
1.	What if the applicant/ intended IDNccTLD Manager is not member of the ccNSO, does proposed policy apply? Does IDN ccPDP policy and the delegation /transfer /revocation policy apply?	Any Policy developed by the ccNSO is by definition only targeted at ICANN (see Annex C of the ICANN Bylaws). Whether an applicant / requester of the IDNccTLD is member of the ccNSO is immaterial. The applicant / requester must meet all conditions set by the policy.	To be included in introduction of Initial report scope of policy and reference to Issue Report	See section 2

(De)-selection Criteria/ retirement related scenarios

Item #	Scenario	Assessment	Adjust proposed policy	Updated section in text Initial Report
2.	Country name is replaced by other country name (in designated language). What if the English/French name of the country doesn't change, but the name of the country changes in the national language?	If the change of the name of the Territory changes in the Designated Language this is considered a change in a basic requirement for IDNccTLD. The proposed policy deals with this situation in section 1.3.1, including when such a change is considered to be a "Trigger Event".	N	NA
3.	What if an IDNccTLD no longer qualifies as an IDNccTLD? Is retirement needed?	As a general statement it cannot be answered but depends on circumstances. However as general principal, if after a change in circumstances the IDNccTLD no longer qualifies as such, such a change could result in a "Trigger Event". The ccPDP4 was tasked to define "Trigger Events" that could initiate the retirement process.	No	NA
4.	What if IDNccTLD manager refuses to go through retirement process?	The Retirement Process is considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy address the test.	No	NA
5.	What if IDNccTLD Manager is no (longer) member of the ccNSO, do deselection and retirement policy apply?	The Retirement Process is considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy address the test.	No	NA
6.	What if the IDNccTLD that is going to be retired is widely used by another community (e.g., tech community (not necessarily local community))?	The Retirement Process is considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy addresses the test.	No	NA
7.	What if the Country name as listed on standard is changed (ENG/FR)	If a Designated Language of the Territory is not French or English, and if only the English and/or French version of the name of the Territory is changed, then such a change does not have any impact.	No	NA
7. a	Assuming the removal of an IDNccTLD string is the result of the change of the name of the territory in the Designated Language.	Support for introduction of "cooling down" period to avoid confusion. Proposed start of "cooling down" period is the moment removal of the relevant IDNccTLD(s) from the root-zone file. Note that that the act of removal is the	Yes: to be included in new section (most likely in Miscellaneous or Applicability of policies	See Section 3.2.1

Item #	Scenario	Assessment	Adjust proposed policy	Updated section in text Initial Report
	Under ISO3166-1 there is a standard cool down - period (or a removal of the territory from the ISO3166- 1 standard. Accordingly (section 7.6.2) *Country code elements that the ISO 3166/MA has altered or deleted should not be reassigned during a period of at least fifty years after the change. The exact period is determined in each case on the basis of the extent to which the former code element was used.* Is this period relevant for the re-use of the country name as an IDNccTLD? Or its variants?	conclusion of the retirement process, but not part of it. What is considered a reasonable period will be determined in new ccPDP. In first reading the suggestions varied from 10-30 years (not considering the duration of the retirement procedure). In second reading the agreed upon minimum period is 10 years. Although a request for re-use may be very unlikely (considering that the selected string must be a meaningful representation of the name of the Territory) a cooling down is believed to be warranted to avoid overlap with cached entries with a very high TTL's, other potential issues, and other uses.		
7.b	Assume an IDNccTLD is removed from the root-zone file. Who determines the IDNccTLD can be re-used again? ICANN, ccNSO, external organization? For Country Code elements to be assigned by the ISO 3166/MA, a code will be re-assigned by the ISO 3166/MA.	In first reading various mechanisms were initially discussed: - Appoint external panel to determine re-use - Leave it to ICANN - Start a ccNSO PDP after retirement of one or more IDNccTLDs has been completed (ccNSO is policy making body) Discussion ended in agreement that ccNSO should launch a ccPDP after removal of the IDNccTLD string(s) from the Root Zone flle, considering the 10-year suggested "cooling down" period of 10 years. Factors to consider in ccPDP to determine in the "cooling down" period before possible re-use are: - Use of the IDNccTLD before retirement - Cause of retirement - Possible re-use of the IDNccTLD string - Mechanism to allow re-use	Yes	See section 3.2.1
8.	What if a selected IDNccTLD string and all its variants are retired and someone else	If all criteria are met, including but not limited to the requirements that the new to be requested selected IDNccTLD string is a meaningful representation of the name of	No	NA

Item #	Scenario	Assessment	Adjust proposed policy	Updated section in text Initial Report
	applies for the retired label. What happens?	Territory etc., then nothing withstands such a new request. However, the cooling down period and the newly to be developed policy will determine when and how the retired string(s) can be applied for (again)		
9.	What if a ccTLD Manager wishes to retire the selected IDNccTLD strings (due to natural reasons, such as removal of support of the script on the governmental level), and the ccTLD IDN to be retired is the selected (primary) IDNccTLD?	Include a general statement, that if a selected cctld string is retired, all delegetable variants which have been delegated, follow the fate of the selected IDNccTLD string. There should be no confusion as to whether the delegatable variants can remain in the root zone. In addition, all non-delegated delegatable variants shall be non-eligible as IDNccTLD for this Territory.	Include a general statement, that if a selected ccTLD string is retired, all delegetable variants which have been delegated, follow the fate of the selected IDNccTLD string.	Section 6.4
10.	What if the script of the local language changes and the country has decided to change the script it uses?	This situation is covered in section 1.3.2 and 1.3.3. In principle a change of the Designated Language and change of the script in which the Designated Language is expressed could initiate the procedure ending in a “Trigger Event”.	N	NA
11.	What if a territory script and language match, but a significantly interested party withdraws from the existing script and would like to propose a new script? Would the Deselection process be triggered?	Whether a significant interested party supports or does not support the script is irrelevant. The SIP is only expected to support the selected string. Note that the for the term Designated Language in other contexts the term “Official Language” is used. To be considered “Designated” under the policy the Language should meet one of the criteria listed in section 1.2.2.	N	NA
12.	What if a country name is changed and the script and language remain the same, however the relevant people would like to retain the same name as they had before the same?	If the country name is changed, and after this change the initial selected IND ccTLD is no longer a meaningful representation of the name of the country in the designated language, the selected string no longer meets the criteria. In principle this could end up in a “trigger event”, However according to section 1.3.1, ICANN is not expected to monitor actively, but as soon as changes are needed the procedure leading to the “Trigger Event” will start.	N	NA

Item #	Scenario	Assessment	Adjust proposed policy	Updated section in text Initial Report
13.	Country split from AA to AA and A'A' . The ISO3166-1 two (2) letter code AA remains for one country. The split results in assigning different ISO3166-1 code A'A' to other part. Before the split (A'A') IDNccTLDs was related to AA and will be kept, including the variant(s), subject to local decision only. This will 'block' the names for the split off Territory A'A'. Is there a way for A'A' to trigger deselection of (A'A') IDNccTLD? And if so can (A'A') request (A'A') IDNccTLD	According to scenario A'A'IDNccTLD was delegated and hence a meaningful representation of country AA. The split of AA into AA and A'A' does not change that A'A'IDNccTLD is still a meaningful representation of AA in the Designated Language and related script. As a result, A'A'IDNccTLD still meets all the criteria, including the meaningful criteria even if SIP of A'A' would like to see it differently.	N	NA
14.	What if the script of the local language changes and the country has decided to change the script it uses?	The IDNccTLD does not meet all the criteria and the procedure of section 1.3.3 applies.	N	
15 (was 16.)	'Merger' scenario – The ASCII for West Gebied is .WG, and the abbreviated name is Gebied. West Gebied merges with South Gebied. For this South Gebied the ccTLD .SG was delegated. Under this test only South Gebied uses an IDNccTLD in the Dutch language **.GEBIED**. After the merger .ST will be retired in accordance with the ccTLD retirement policy. What will happen with the IDNccTLD **.GEBIED**?	The basic principle of the proposed policy is that if the reference to a **Territory** is removed from the ISO3166 – 1 standard because two or more Territories have merged, this removal is considered a "trigger event". This will cause the initiation of the process for the retirement of **all the selected IDNccTLD(s) (and their variants),** which are a meaningful representation of the name of the **Territory**. However, if GEBIED is a meaningful representation in the Designated language of the merged Territory, and the Significantly Interested Parties of the "merged" Territory support the IDNccTLD, it should not be retired. Note that the basic criteria only one (1) IDNccTLD string per Designated Language applies (section 1.3.2). So, if there is already a IDNccTLD for the merged territory in the same Designated Language, GEBIED shall need to be retired.	Y, adjust Principle I and possibly section on Support for the strings	Section 13.1

Variant and variant management test

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
17	EPDP scenario. An IDNccTLD seeks supports for variant set, along the way something happens with selected string, primary (i.e. selected string) is no longer eligible.	If a selected IDNccTLD does not meet any of the criteria (hereafter is "not valid" or "invalid"), variants are not calculated anymore. Note there is no general statement that if a selected string does not meet all requirements, the variants are considered not valid anymore. The CS subgroup agreed to the following: If the selected string is not valid, all related variant strings are invalid. Rationale: The selected string is considered the core or primary string. All delegatable variants strings are derived from this string through the RZ-LGR. So, if the core or primary string is considered invalid, all strings that are derived from this core or primary string should be invalid as well. And from the related Notes and Observations *It is noted that if the selected string is not valid, but a delegatable variant IDNccTLD string is valid, this string could be considered the selected IDNccTLD string, and pass. To avoid unnecessary administrative burden by renewed submission, which is always possible, ICANN is advised to accept a note confirmation that one of the delegatable IDNccTLD strings that is valid, is deemed to be the selected IDNccTLD string. The note of confirmation shall need to be supported by the Significantly Interested Parties that support the original request.*	Confirmed in first reading that only if selected string meets all criteria the variant set is valid. This recommendation needs to made general	Section 6.4 and section 13.5
18.	What if IDNccTLD Manager applies for a Variant string that is not in official language of country. The IDNccTLD managers wants to serve non-official language users. Limitation of usability by limitation of criteria?	According to the proposed policy only **Allocatable VARIANTS** of the selected IDNccTLD string that are **Meaningful Representations** of the name of the **Territory** in the **Designated Language** according to section 1.1-1.8 and section 2.1 and 2.2**,** are eligible to be delegated. The national consideration which community is to be served, and hence the registration policy is out of scope of this and other ccNSO PDPs	No	NA

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
19	Asymmetrical variants. Sometimes variants are asymmetrical: if you go from label A to label B, label B is allocatable, however sometimes going form Label B to label A it is blocked. How will this play out under the policy?	Variants are derived from the selected IDNccTLD string through the RZ-LGR. Assuming string A is the selected IDNccTLD string and string B an allocatable variant of A, then string B could be a delegatable variant of the selected IDNccTLD A if all criteria are met. However, assuming asymmetry, and string B is the selected string and string A is blocked variant of string B, then by definition variant IDNccTLD string A is non-eligible.	No	NA
20.	IDN1 is the selected IDNccTLD string in Chinese, and IDN2 and IDN3 are variants under Chinese RZ-LGR. IDN3 is a variant in Japanese. Is IDN3 in Japanese eligible?	Only Allocatable VARIANTS of the selected IDNccTLD string that are Meaningful Representations of the name of the Territory in the Designated Language are eligible. Therefore, if IDN3 is a meaningful representation in another Designated Language it may be requested.	No	NA
New 20 a.	IDN1 is selected IDNccTLD string in Chinese, and IDN2 is allocatable variant and IDN3 is a blocked variant under Chinese RZ-LGR. Someone applies for a string IDN3" in Japanese that looks similar to IDN3. Is the string IDN3" eligible?			See test 33
New 20 b.	IDN1 is the selected IDNccTLD string in Chinese, and IDN2 and IDN3 are allocatable variants under Chinese RZ-LGR. IDN3 is also meaningful representation in Japanese. Japanese is also a Designated Language of the country. Another applicant applies for IDN3.	Although IDN3 is a meaningful representation in another Designated Language, it is also a variant of the already delegated string IDN1. IDN3 can only be requested by the requestor of IDN1.	N	NA
21.	Assume asymmetrical variants: A-> B allocatable, B-> A is blocked as a result of the RZ-LGR. What if an applicant has applied for A first and then applies for B?	Before RZ-LGR became effective the applicant could not request any variants. Only after a script has been integrated into the RZ-LGR variants can be calculated and hence applied for. Note that the according to Principle IV the request for (and delegation) of IDNccTLDs, is an ongoing process.	N, however, make explicit in policy that at the time of application the rules at the time the application is submitted.	See section 6.5

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
	What if an applicant has applied for B first, before RZ-LGR became effective, and then wants both (B and A)?	It is implied in the Fast Track Process Implementation Plan (FIP) (section 3.4) and section 6.2.2 of this proposed policy that variants can be requested after the selected string was delegated (including Delegatable variants of IDNccTLD strings that were delegated under the Fast Track Process). However, as implied in section 3.4 of the FIP, and 6.2.2, that a variant is only valid if at the time of application, it is valid according to the RZ-LGR. If according to the RZ-LGR at the time of submission of the application of IDNccTLD B this variant is an allocatable variant of A, B is "valid" and assuming all other criteria are met, then B is eligible. If according to the RZ-LGR at the time of submission of the application of IDNccTLD A this variant is a blocked variant of B, then A is "not valid" and therefore not eligible. Finally, it is noted that there is an expectation that the requester and relevant community using the script in which the IDNccTLD string is expressed, will have participated in the related script generation panel. This would have allowed the requester and Significantly Interested Parties to build an alternative case with respect to strings A and B .		
21 a	Same scenario as under 21, but with expectation that at the time of application and delegation of the selected IDNccTLD string, the variant would become available i.e. the variant would be "valid" under RZ-LGR?	At the time of application under the Fast Track variants were not available, however one could express an interest in a desired variant. At the same time, it was made clear that ultimately the rules at the time of application of the variant of the selected string determine whether a string is valid. Under this scenario, whether there was an expectation that a variant would be "valid" is not relevant. Only relevant is the set of rules that is effective (including the RZ-LGR) at the time of application of a specific string, whether a selected IDNccTLD or Delegatable variant of the selected string.	See Item 21	Section 6.5
22.	The application of RZ-LGR makes the currently delegated ccTLDs become variant of each other. How will this play out?	To date (March 2023), IDNccTLD are selected and delegated without applying the RZ-LGR. According to the proposed policy under section 9 C each of the currently delegated IDNccTLDs are grandfathered, irrespective of	N	NA

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
		whether they are considered variants through the RZ-LGR. In the event a change in RZ-LGR causes a "collision" between ccTLDs, it is expected that this is pointed out to the generation panel. The generation panel is expected to share the motivation of still doing that change, to ensure all are informed. See https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf Recommendation 12.		
23.	String A has allocatable variants: A1, A2. But A1 -> A2 blocked variant and A2 -> A1 blocked variant. A, A1, A2 have all been delegated What happens if A is deselected? Can A1 and A2 remain delegated, even if they wouldn't be allowed to co-exist without the initial label A?	According to section 6.2.1 and 6.2.2 Variants of the selected sting are derived from and directly related to the selected IDNccTLD through the RZ-LGR, in other words, if no selected IDNccTLD then no variants. As a result, the deselection of selected string A shall result in deselection of variant strings A1 and A2. The proposal does provide for specific situation that although A is deselected, A1 may continue (see section on deselection by SIP). However, in such a case A2 also must be retired as it is a blocked variant of A1.	To be made explicit in the policy	See section 6.5 and section 6.2.3
24.	Is there a need to synchronize between ccPDP4 and EPDP sets of recommendation when blocked IDN strings are involved? ~~because in the end it is going to be in IANA for the IDN variants.~~ Assume a particular IDN string is applied for without variant, does the applicant has the right to register/ claim and refer to all the variants of the selected IDNccTLD string at a later stage?	In principle (Principle IV) the IDNccTLD selection process is open, implying there is no time limit for selection of a string in a territory and request for a IDNccTLD string or its delegatable variant. Further, according to Principle V, criteria determine the number of IDNccTLD per territory, including the number of variants to be delegated. In addition, the number IDNccTLDs strings is limited to one IDNccTLD per Territory, with the exception of delegatable variants. If a Delegatable variant meets all the criteria (other than one string per Territory). As re-stated in section 3.2.3 only allocatable variants of the selected IDNccTLD that are a meaningful representation of the name of the country are eligible. According to the notes and observations of section 3.2.2: *For variants to be eligible for delegation, section 3.2.3 implies that all criteria apply and the*	Suggestion is no change	NA

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
		required documentation and support from the Significantly Interested Parties must be available for all requested variants before validation. Section 3.2.3 also implies that if - for example – a Delegatable variant of a selected string is considered confusingly similar to an already delegated IDNccTLD or gTLD and not associated with the same territory, it is not valid. Therefore, a right to all variants cannot be assumed.		
25	How does an IDNccTLD Manager of an already selected and delegated IDNccTLD string apply for a delegatable variant TLD - is it the same process given the primary string is already delegated?	According to Principle IV the request for (and delegation) of IDNccTLDs is an ongoing process. It is implied in section 6.2.2 that variants can be requested after the selected string was delegated (at least variants from IDNccTLD strings that were delegated under the Fast Track Process. All requests must follow the same validation process as defined through section 8.2 the String Validation stage. If as suggested letters of support are from different entities, this should be clarified by the applicant. Under the Fast Track Process, ICANN and PTI have acquired a lot of experience with these types of situations. It is therefore considered a matter of implementation (as under the Fast Track) so called conflict of forms	Make explicit that Delegatable variants can always be requested. This is implication of Principle IV and implied in section 6.2.2 transitional arrangement. However, the validation procedures also apply to request of Delegatable variants of the selected IDNccTLD string.	See section 2, Principle IV and section 6.5
26.	What if a Delegatable variant of the selected IDNccTLD string is delegated before the Selected IDNccTLD is delegated?	The Notes and Observations of Section 6.2.3 imply that all criteria apply and the required documentation and support from the Significantly Interested Parties must be available for all requested variants before validation and delegation. As the ccNSO process is an open process, both in terms of requesting a an IDNccTLD string as in terms of requesting delegation of IDNccTLD strings, and all the requested strings meet all criteria, the order of delegation and delegation requests is not relevant	N	NA
27.	Assume IDN 1 is delegated. Manager IDN 1 applies for variant IDN 2. IDN2 is variant of IDN 1. Will IDN2 be eligible	The IDNccTLD process is open (see Principle IV), meaning IDNccTLD strings and their delegation can be requested any time. It is not explicitly stated that Delegatable variants can be requested any time independent, but	Update the document to make explicit that Delegatable	Y, see also item 24, 25 and 26.

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
	for delegation, and can it be delegated?	after the request of the selected IDNccTLD string. However, note that IDN2 can only be delegated to the same ccTLD Manager.	variants can be requested at the time or after the request for the selected IDNccTLD string has been submitted	
28	Assume that as the result of a needed amendment of the RZ-LGR, an IDNccTLD string causes a demonstrably threat to the DNS and the IDNccTLD should be retired. The retirement of a ccTLD (including IDNccTLD) takes at least 5 years as of the Notice of Retirement). Given this duration of the retirement should the change to the RZ-LGR become before the retirement is effective? Should the IDNccTLD be grandfathered during this period?	According to section 6.2.4 the basic rule is that he IDNccTLD should be grandfathered when the RZ-LGR is amended. Only when as a result of the change of the RZ-LGR it is demonstrated that the stability and security of the DNS is demonstrably threatened and deselection the only demonstrably measure to mitigate such a threat, such an IDNccTLD should be deselected. Note that according to the GNSO IDN EPDP, all strings should be grandfathered. However, also note that the deselection decision only demarcates the start of the retirement process of the IDNccTLD. This process itself will take at least 5 years and is not governed by this policy but by the retirement policy. As a result, the threat to the DNS will remain during this period of retirement and prior to the removal for the DNS Root zone file. In addition, changes to the RZ-LGR consider external influences and only become effective after an extensive public consultation. This public consultation provides opportunities to the community to advise of the potential threat caused by the proposed change of the RZ-LGR.	Adjust the proposal. The delegated IDNccTLD string and its delegated variants should be grandfathered . Aligns with GNSO IDN EPDP	Section 6.2.4
29	An applicant, request a single character IDNccTLD, which meets all criteria (Meaningful, Designated Language, supported by SIP, etc.). Is string eligible under the policy?	If a string meets all criteria, nothing prevents it from being requested. However, note the criteria of only one IDNccTLD string per Designated Language apply. However, note SAC 052 (2012): https://www.icann.org/en/system/files/files/sac-052-en.pdf In SAC 052 two potential issues were identified:	Include statement in policy that Single character IDNccTLD strings are not eligible. However also note this statement should be revisited as	See section 4.1

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted section in text Initial Report
		• Single Character TLDs are more likely to cause user confusion than TLDs with more characters • Work on user confusion/string similarity and IDN variants needs to be completed, Currently, the work on confusion/ string similarity is not completed nor will it be completed in foreseeable future. Therefore, the concerns raised in SAC052 are still relevant. Considering the need to ensure the security and stability of the DNS, the application for Single character IDNs under this proposed policy is currently deferred.	part of the first review of the policy.	

Confusing Similarity Tests

Item #	Scenario	Assessment	Adjust proposed policy	Adjusted paragraph in text
30	New manager applies for a CS of incumbent's non-delegated but allocatable variant. What options are open for incumbent, what is impact of CS	The application of the new manager will go through the string validation process, including the CS evaluation. If the String Evaluation Panel finds the string confusingly similar with the already delegated string, a delegatable or other variant of the already delegated string, the requested string is not eligible. If it is not found to be confusingly similar, the string is considered valid. The incumbent has no options to object and or participate, which is in line with the basic principle around sovereignty of ccTLDs	N	NA
31	Applicant applies for IDN 1 (the selected IDNccTLD string) and delegatable variant IDN2. IDN 3 is a blocked variant of the selected string IDN1. IDN 1 and IDN 2 are not Confusingly Similar to other strings. Assume IDN 3 is Confusingly Similar with an already delegated IDN TLD, how will this play out?	According to the proposed policy the requested IDNccTLD string and its delegatable variants will be in included in the Request Side of the Base for Comparison (Section 4.2.3 A) and validated on CS against the strings/labels included in the Comparison Side (Section 4.2.3 B). By definition IDN3 (the blocked variant) cannot be requested and is not included in the Request Side. Therefore, no consequences.	N	NA

32	The base for comparison under the ccPDP4 proposals (section 4.2.3) includes the selected string and delegatable variants at the Request side. On the Comparison Side they include both delegated and applied gTLD and ccTLDs and their variants. However, how will comparison between a ccTLD string and a gTLD label play out, given that delegatable variants of gTLDs are not defined, but only allocatable or blocked variants?	Note that currently the proposed Comparison Side (section 4.2.3 B) of the Base for Comparison includes primary delegated IDNccTLD and gTLD delegatable IDNccTLDs variants, and TLDs in application process and secondary include allocatable and blocked variants of TLDs. Therefore, one may expect that if there is a need to evaluate IDNccTLD string(s) with gTLDs, at a minimum allocatable variants derived from gTLDs already delegated or in process are included in the base of comparison.	N	NA
33	IDN1 is selected IDNccTLD string in Chinese and delegated, and IDN2 is a delegatable variant and IDN3 is a blocked variant under Chinese RZ-LGR. Someone applies for a string IDN3" in Japanese that looks similar to IDN3, but is NOT a variant. Is the string IDN3" eligible?	IDN3" is by definition included in the Request Side (4.2.3 A) of the Base for Comparison for the CS validation. IDN1 and IDN2 will by definition be included in the Comparison Side (4.2.3. B) of the Base for comparison, Secondary IDN3 is expected to be included in the Comparison Side, and in all cases the Similarity Evaluation Panel needs to provide a rationale on the in- or exclusion of the blocked variant IDN3 in the Comparison Side. Assuming IND3" is confusingly similar with IDN3, it is not valid.	N	NA

Annex D - Public Comment Summary and Analysis

Public comment open for Submissions Date:
Wednesday, 16 August 2023

Public comment Closing date for Submissions:
Wednesday, 27 September 2023

Outcome of Public comments:
In total four (4) submissions were received: two (2) from community groups, one (1) from an individual, and one (1) from ICANN org.

The comments are categorized as general observations and specific issues. This Public Comment summary report includes the ICANN org staff summary of the comments and observations on the topics raised by the submitters in relation to the scope of the policy recommendations.

The working group has reviewed the comments in more detail and where needed adjusted the recommended policy. The review is included in the working groups final report.

Section 1: Submissions

Organizations and Groups:

Name	Initials
TWNIC	TWNIC
ICANN org	ICANN
AT-LARGE ADVISORY COMMITTEE	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Julius Kirimi	AFRALO	JK

Section 2: Summary of Submissions

General Comments

TWNIC is in general support of the proposed policy, and specifically learning from insights and experience from the Fast Track Process and take these lessons into account in the proposed policy.

In the view of JK the report is excellent, but more input is needed to amplify and cover more specific areas to avoid gaps

The ALAC and At-Large community expressed their support for the proposed policy. Attention is drawn to the ICANN Board's request to the ccNSO and GNSO to develop a consistent solution for handling both variant IDNccTLDs and variant IDNgTLDs. This is considered important to ensure consistent implementation and to maintain a consistent user experience.

Specific Comments

TWNIC supports the proposed transitional arrangement that all IDNccTLD strings that were validated under the Fast Track will be deemed to be validated under the proposed policy, and hence that the agreements between an (IDN)ccTLD Manager and ICANN are "grandfathered-in" under the policy after it replaces the Fast Track Process.

JK suggested some potential grammatical changes and include Verification as concept as validation and verification are inseparable.

ICANN comment on limitation of delegation of variants (section 6.2.3 of Initial Report) – ICANN recognizes that limitation of delegation of variants was extensively discussed by the ccPDP4 WG, however it notes that by introducing the designated language requirement for a variant of the string as requirement for delegation of the variant string the usability of variant TLDs for some script communities could be limited. ICANN suggested the following: "The IDN ccPDP WG may consider making *Allocatable Variants of the selected IDN ccTLD string that are Meaningful Representations of the name of the Territory which are not in the designated language eligible for application in section* ***6.2.3 Limitation of delegation of variants."***

ICANN comment on scope of string similarity review (section 7.2.3.A) – ICANN raised that the scope of the string similarity review on the Request Side may not fully address security issues and is not consistent with the GNSO IDN EPDP. ICANN proposes that the Similarity Evaluation Panel "should *determine which additional variants of the basic set of strings should be included in the* ***Request Side,*** *factoring in: The likelihood of misconnection, Scalability, and Unforeseen and/or unwanted side effects. In its report, the Panel must provide its reasoning for its determination, whether to include additional variants of the basic set of strings included in the request side."*

ICANN comment concerning confidentiality requirement during processing of requests (Section 15.1) – ICANN requests guidance on sharing data of requested ccTLDs and applied- for gTLDs for the string similarity evaluation processes for IDN ccTLDs and gTLDs. There is a possibility that an IDN ccTLD string is requested during a gTLD round. In this case, the requested IDN ccTLD string and the applied-for gTLD strings will need to be compared for string similarity by the String Similarity Review Panels as part of both the gTLD and the ccTLD application evaluation.

ICANN comment on precedence of similar IDNccTLD and gTLD recommendations – ICANN requests guidance on how to act in situations where a requested IDN ccTLD string is requested during a gTLD round and the requested IDN ccTLD string and the applied-for gTLD strings are found to be similar by IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel. The IDNccPDP4 is suggested to consider the related details in the IDNccTLD Fast Track Process (section 5.5) and/or to be discussed with the GNSO IDN EPDP WG.

ICANN comment on introducing the Risk Treatment Appraisal (Section 8.8) – ICANN notes that by proposing the Risk Treatment Appraisal Procedure IDNccTLD strings that are confusable in the uppercase form are introduced into the root zone.

Analysis of Submissions and Need to adjust policy

In this section the comments raised are analyzed and where needed a suggestion for updated text of the proposed policy will be included in redline.

General Comments

General support of the proposed policy

Comment	WG Analyses	Update of Proposed Policy text, if any
TWNIC is in general support of the proposed policy, and specifically learning from insights and experience from the Fast Track Process and take these lessons into account in the proposed policy	No observations by the WG, this comment is considered in support of the proposed policy	No need to update

More input is needed to amplify and cover more specific areas to avoid gaps

Comment	WG Analyses	Update of Proposed policy text if any
More input is needed to amplify and cover more specific areas to avoid gaps	It is unclear to the WG which specific areas need to be covered as they were not specified. In addition, the WG notes that the stress tests (Annex D of the Initial Report) do cover a lot of specific situations to test how the policy would play out in these situations.	No need to update the policy

Board request to the ccNSO and GNSO for handling both variant IDNccTLDs and variant IDNgTLDs consistently

Comment	WG Analyses	Update of Proposed policy text if any
Attention is drawn to the ICANN Board's request to the ccNSO and GNSO to develop a consistent solution for handling both variant IDNccTLDs and variant IDNgTLDs to ensure consistent implementation and to maintain a consistent user experience.	The WG is very aware of the need to develop consistent policies, both between GNSO IDN EPDP phase 1 and the ccPDP4 and between ccPDP4 and the broader body of ccTLD related policies. The working groups notes that consistency and/or consistent means "free from variation or contradiction" or "holding to the same principles". With respect to the consistency between the GNSO IDN EPDP and ccPDP4 developed policies the WG is of the view that one the one hand there is no requirement that the policies should be the same i.e completely similar and on the other hand the policies should not contradict each other. As noted in Annex E of the Initial Report the GNSO IDN EPDP and ccPDP4 proposals are not the same in details not be same in details, but as also noted in the initial ICANN staff analyses the proposed policies do not contradict each other, but merely stress or limit different aspects of variant management. As stated in Annex E of the Report, the differences result from the differences in policy development processes, scope of the issues that need to be addressed, and principles or design criteria.	No need to update the proposed policy

Specific comments

Support for the proposed transitional arrangement re IDNccTLD selected under the Fast Track Process

Comment	WG Analyses	Update of Proposed Policy text, if any
TWNIC supports the proposed transitional arrangement that all IDNccTLD strings that were validated under the Fast Track will be deemed to be validated under the proposed policy, and hence that the agreements between an (IDN)ccTLD Manager and ICANN are "grandfathered-in" under the policy after it replaces the Fast Track Process.	No observations by the WG, this comment is considered in support of the proposed policy. With respect to comment on the agreements between an (IDN)ccTLD Manager and ICANN, the WG has no view as this is considered a matter that is out of scope of this ccNSO Policy Development Process	No need to update the proposed policy

Clarification of text

Comment	WG Analyses	Update of Proposed Policy text, if any
Suggested potential grammatical changes and include Verification as concept as validation and verification are inseparable	No further observations by the WG. The WG is aware the text needs further review	The suggested grammatical change and others will be made in the Final report

Expanding usability of variant IDNccTLDs for some scripts

Comment	WG Analyses	Update of Proposed Policy text, if any
ICANN recognizes that limitation of delegation of variants was extensively discussed by the ccPDP4 WG. However, it is noted that by introducing the designated language requirement for a variant	The WG agrees that in some cases the usability may be limited by requiring that variants need to be a meaningful representation in a Designated Language. However, it is noted that one the proposed basic criteria is that an IDNccTLD for a Territory must be in a	No need to update the proposed policy

of the string as requirement for delegation, the usability of variant TLDs for some script communities could be limited.	language that "*has a legal status in the Territory or that serves as a language of administration"* (section 4.2.2*)*. It is further proposed that a language is considered Designated if "*The relevant public authority in the Territory confirms that the language is used in official communications of the relevant public authority and serves as a language of administration"* (see section 4.2.2 (c)). Hence whether a language is Designated is a national/local matter, the consideration about usability is also a local matter.	

Scope of the string similarity review on the Request Side

Comment	**WG Analyses**	**Update of Proposed Policy text, if any**
The scope of the string similarity review on the Request Side may not fully address security issues and is not consistent with the GNSO IDN EPDP. ICANN proposes that the Similarity Evaluation Panel "should *determine which additional variants of the basic set of strings should be included in the* ***Request Side,*** *factoring in: The likelihood of misconnection, Scalability, and Unforeseen and/or unwanted side effects. In its report, the Panel must provide its reasoning for its determination, whether to include additional variants of the basic set of*	It is noted that only allocatable variant strings that are a meaningful representation of the name of a country in a designated language may be requested as a variant form of the selected (or primary string) and hence potentially delegated as a ccTLD string. As stated in the Initial Report of the WG, the WG considered and develop the policy proposals on the SSAC advise in SAC060: when introducing variants, the policy making bodies should consider*, a distinction should be made between two types of failure modes:* ***no-connection*** *versus* ***misconnection.*** No-connection may be a nuisance for the user, like a typo, however	The request side for the Base for Comparison is comprised of and should always include the: • Selected string, and • Requested Delegatable variants (only those allocatable variants, which are a meaningful representation of the name of the territory in the designated language and related script and requested at the time of submission of the request) Secondly, ~~if~~ the Similarity Evaluation Panel may include additional variants of the basic set of strings in the request side (other non-delegatable allocatable variants and/or

strings included in the request side."	misconnection may result from user confusion, and this could be avoided though the similarity review. The WG understands that under circumstances a misconnection may result in situation where a user mistakenly recalls and uses a non-delegated variant of a delegated TLD and hence mis-connects with a TLD. This could be avoided if the similarity review, would include allocatable and blocked variants of the requested ccTLD in the validation process. The WG extensively discussed the likelihood of such a string of events, taking into account the special nature of the selected IDNccTLD strings and its allowable variants under this policy (meaningful representation of the name of a territory in script in which a designated language is expressed), scope of confusing similarity evaluation and inherent subjective nature of the validation. However, the WG is of the view that given the unknow scope of confusing similarity issues due to the introduction of variants, the possibility for a review of the outcome of the similarity evaluation on a case by case basis by the similarity review panel and/or risk mitigation panel, and the review of this and other recommendations pertaining to the confusing similarity validation as part of the first review of the	blocked variants), factoring in: • The likelihood of misconnection • Scalability, and • Unforeseen and/or unwanted side effect. In its report, the Panel must provide its reasoning for its determination, whether to include additional variants of the basic set, and, if so, which were included (see section 8.4.2.3) New: Section 7.2.5 This section 7.2 (7.2.1 to 7.2.4), and section 8.6.4.3 - specifically the scope of the comparison, role of the Similarity Evaluation Panel in determining the scope, and, the impact on validation of the selected IDNccTLD string, shall be subject of the first review of the IDNccTLD string selection policy, as foreseen in Section 15 Review of policy for the selection of IDNccTLD strings. Alternative B (read in conjunction with text Alternative B section 7.2.3.A above and) Strike Initial Report sections **8.6.4.3.a to 8.6.4.3.c.** and replace section 8.6.4.3.a with **New Section 8.6.4.3**: If according to the evaluation of the selected IDNccTLD string and/or the evaluated variants, the selected string and/or one or more of the evaluated variant(s) is/are

	effectiveness and impact of the policy recommendations and its implementation a conservative approach of the similarity evaluation is warranted. Additionally, the WG considered that by allowing the Similarity Evaluation Panel, to set the detailed scope of a specific evaluation, and requirement to provide a rationale for the scope of the review in a specific case, a nuanced approach allowing the panel to consider all relevant factors would be achieved. The outcome of the review and rationale would be setting the scope of the review and/or risk mitigation discussion.	found to present a risk of string confusion, ICANN staff shall inform the requester, considering section 11 below. The requester may call for a Similarity Review or Risk Mitigation Appraisal and provide additional documentation and clarification referring to aspects in the report of the Panel. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN and include the additional documentation. After receiving the notification from the requester, ICANN staff shall call on the Similarity Review Panel (SRP) or RTAP Panel. IDNccTLD strings, which were delegated prior to the date this proposed policy becomes effective, are not affected by section 8.6.4.3 if (a) Delegatable variant(s) of that IDNccTLD is/are requested and found to be confusingly similar.

Confidentiality of information

Comment	WG Analyses	Update of Proposed Policy text, if any
ICANN requests guidance on sharing data of requested ccTLDs and applied- for gTLDs for the string similarity evaluation processes for IDN ccTLDs and gTLDs. There is a possibility that an IDN ccTLD string is requested during a gTLD round. In this case, the requested IDN ccTLD string and the applied-for gTLD strings will need to be compared for string similarity by the String Similarity Review Panels as part of both the gTLD and the ccTLD application evaluation.	The WG appreciates the concern of ICANN resulting from the need to keep information and support documentation confidential up and until it has been established that the selected string meets all criteria. The WG also notes that this concern was addressed for the a*ssessments "during the DNS Stability Evaluation for Fast Track requests and in the Initial Evaluation step for new gTLD applications" (see section 5.5 FIP and below).* The WG suggests that ICANN may use a comparable method going forward, which is considered a matter of implementation.	Amend section 15.1: Delete Notes and Observations, which are related. Confidentiality of information during validation process, unless otherwise foreseen. It is recommended that the information and support documentation for the selection of an IDNccTLD string is kept confidential by ICANN until it has been established that the selected string meets all criteria. However relevant information will have to be shared with the external panels as foreseen in section 8.3.1 above, and the similar panels for new gTLD applications for purpose of conducting their business. Further details are considered a matter of implementation. New Notes and Observation As stated in section 8.2 (Administrative Validation of the selected string, it is assumed that if one or more elements of the request are not complete or deficient, ICANN shall inform the requester accordingly, and the requester should be allowed to provide additional information, correct the request, or even withdraw it. To allow this dialogue to take place, it is recommended that information is kept confidential as under the Fast Track

		Process, and like the handling of ccTLD delegation transfer and IANA Function related requests.

Contention rules between IDNccTLD Similarity Evaluation and new gTLD similarity review

Comment	WG Analyses	Update of Proposed Policy text, if any
ICANN requests guidance on how to act in situations where a requested IDN ccTLD string is requested during a gTLD round and the requested IDN ccTLD string and the applied-for gTLD strings are found to be similar by IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel. The IDNccPDP4 is suggested to consider the related details in the IDNccTLD Fast Track Process (section 5.5) and/or to be discussed with the GNSO IDN EPDP WG.	The WG appreciates the comment from ICANN regarding the in situations where a requested IDN ccTLD string is requested during a gTLD round and the requested IDN ccTLD string and the applied-for gTLD strings are found to be similar by IDN ccTLD Similarity Evaluation Panel or gTLD String Similarity Review Panel. It is the understanding of the WG that the GNSO IDN EPDP WG has suggested a procedural approach, which is like the approach included in the IDNccTLD Fast Track, which reads in section 5.5: *String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, such as:* • *Requested IDN ccTLD strings against existing TLDs and reserved names;* • *Requested IDN ccTLD strings against other requested IDN ccTLD strings;* *and*	Add new section 7.2.4: String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, such as, but not limited to: • Requested delegatable variant IDN ccTLD strings against existing TLDs and reserved names; • Requested (delegatable variant) IDN ccTLD strings against other requested IDN ccTLD strings; and • Requested IDN ccTLD strings against applied-for gTLD strings and related variants. Although contentious situations between IDNccTLD requests and new gTLD applications are considered unlikely to occur, assessments of whether strings are considered confusingly like existing or applied-for new gTLD strings and their variants are made during the Similarity

	• *Requested IDN ccTLD strings against applied-for gTLD strings.* *Contention situations between Fast Track requests and new gTLD applications are considered unlikely to occur. Assessments of whether strings are considered in conflict with existing or applied-for new gTLD strings are made during the DNS Stability Evaluation for Fast Track requests and in the Initial Evaluation step for new gTLD applications. The following supplemental rules provide the thresholds for solving any identified contention issues:* *C. A gTLD application that is approved by the ICANN Board will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.* *D. A validated request for an IDN ccTLD will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.* *For the above contention rules, an IDN ccTLD string request is regarded as validated once it is confirmed that the string is a meaningful representation of the country or territory and that the string has passed the DNS Stability*	Validation for requested selected IDNccTLD strings and/or their eligible variants and in the Initial Evaluation step envisioned in the next round of new gTLD applications. The following supplemental rules provide the thresholds for solving any potential contention issues: E. A gTLD application and/or related variants related that is approved by the ICANN Board will be considered an existing TLD in inter-process contention, unless it is withdrawn. Therefore, any other later application for a similar string (whether primary or related variant) is deemed to be invalid. F. A validated request for an IDN ccTLD and/or requested delegatable variant will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string is deemed to be invalid. For purposes of the above contention rules, an IDN ccTLD string request is regarded as validated once it is confirmed that the string is a meaningful representation of the name of

	Evaluation as described in Module 4.	the Territory and that the string has passed the Technical and Similarity Evaluation as described in sections 8.5 and 8.6.

Comment on introducing the Risk Treatment Appraisal (Section 8.8)

Comment	**WG Analyses**	**Update of Proposed Policy text, if any**
ICANN notes that by proposing the Risk Treatment Appraisal Procedure IDNccTLD strings that are confusable in the uppercase form are introduced into the root zone.	The WG notes that although in SAC089 it is noted that "Confusability cannot be considered in isolation from other issues related to security." The SAC089 was published in 2016 in response to ccNSO Comments on SAC084. Following this exchange, the ccNSO and SSAC - at the request of the Board created a joint working party to address this issue and other issues identified by both SSAC and the ccNSO with respect to the interpretation of RFC 6912, interpretation of similarity evaluation findings and mitigation measures. This working party submitted its report, which was approved by both the ccNSO and SSAC in August 2017, and resulted in an update of the Fast Track Implementation Plan in October 2017, adding the step of the Risk Treatment Appraisal Procedure. In their Report the joint working party noted that *"the level of acceptable residual risk needs to be determined as well as the method of how it should be determined and evaluated."*	No need to adjust the proposed policy

	It was also noted that *"there is no general hard and fast rule with respect to the mitigation measures that should be implemented or with respect to the acceptable level of risk. It all depends very much on the circumstances, context and interplay of proposed measures and current and future risks associated with the confusing similarity of proposed strings. Therefore, it is recommended that each case is evaluated independently.* *The intended manager for the requested IDN ccTLD, and, if needed, supported by the relevant government, should propose mitigation measures, which are then reviewed, discussed and, if accepted by all involved, agreed upon."*	

Annex E. Comparison initial recommendations ccNSO PDP4 and GNSO EPDP

On 14 March 2019, the ICANN Board approved a set of recommendations for managing the IDN variant TLDs that were developed by ICANN org in the "Staff Paper". The Board also requested the ccNSO and GNSO:

- To take into consideration the variant TLD recommendations in the Staff Paper while developing their respective policies to define and manage the IDN variant TLDS for the current TLDs as well as future TLD applications; and
- Keep each other informed of the progress in developing the relevant details of their policies and procedures to ensure a consistent solution, based on the variant TLD recommendations, is developed for IDN variant ccTLDs and IDN variant gTLDs.

In 2021, the GNSO and the ccNSO commenced their respective IDNTLD related PDPs: the GNSO Council approved the charter for an Expedited Policy Development Process on IDNs ("EPDP-IDNs") in May 2021;152 and the ccNSO Council approved the charter for Policy Development Process 4 on the (de) Selection of IDNccTLD Strings ("ccPDP4") in August 2021.

In response to the Board's request that the two efforts keep each other informed and keep each other abreast of potential issues and identify areas of potential differences using various methods:

- In accordance with its charter the ccPDP4 and appointed liaisons to EPDPIDN and vice versa.
- In addition, membership of both groups overlapped i.e., people from different communities (ALAC, ccNSO, GNSO, SSAC and ICANN staff) were participating in both efforts.
- The PDP groups also met periodically to discuss the alignment of their preliminary recommendations.
- Finally, the ICANN org staff that support both efforts are in regular contact.

Based on the work to date, 6 areas of differences were identified **between the** set of recommendations pertaining to the introduction of variants. The ccPDP4 WG notes that the comparison is related to the preliminary recommendations to date, and these may change again. For example, in the IDN EPDP4 Initial report comparison dated 24 April 2023 section 5, one of the differences listed is on Impact on delegated IDNTLDs due to a RZ-LGR update. However, due to additional discussion in the ccPDP4 WG there is no difference anymore (the recommendations in this area are now similar).

The differences are listed in the Table below:

Table: Overview differences between initial proposals IDN TLD selection Policies

#	Topic	GNSO Recommendation	ccNSO (IDN ccPDP4)	Commentary
1	Applying for strings in scripts not supported by RZ-LGR.	Such strings should be processed up to but not including contracting. (SubPro)	Such strings cannot proceed for evaluation until the relevant script is integrated into RZ-LGR.	The IDNccTLD request process is ongoing. A script community is expected overlap with community with an interest in the IDNccTLD, as the IDNccTLD is expected to serve that community and part of the community is expected to be involved as part of the Significantly Interested Parties, they should work with the community to develop the LGR for a specific script and have an interest to include it in the RZ-LGR and then apply after it is updated. As gTLDs are applied in rounds, the application should be admitted but not contracted until RZ-LGR is updated and the string is finally reviewed.
2.	Dispositions of variant TLD labels and their application as variant TLD.	Valid TLD strings should be categorized as primary, Allocatable, or Blocked. (IDN EPDP)	Valid TLD strings should be categorized as selected (primary), Delegatable, Allocatable or Blocked.	ccPDP4 proposes that only delegatable strings, [the subset of allocatable strings which meet the general criteria for selection of IDNccTLD strings (meaningful in an official language and expressed in the related script)] are eligible for delegation. Other allocatable strings/labels are not allowed for application for ccTLDs. The IDN EPDP considers that all allocatable labels are allowed for application for gTLDs, but whether they can be delegated is subject to successful evaluation. The primary label or selected string is the main applied-for string that acts as the source label for calculating the allocated and blocked labels through RZ-LGR.
3.	Scope of string similarity review between a pair of strings.	(Primary + Allocatable) x (Primary + Allocatable + Blocked) (in each direction)	(Primary + Delegatable) x (Primary + Delegatable + expanded to allocatable or blocked, depending on	When two strings are being compared for string similarity review, the IDN EPDP team suggests comparing the complete variant label set against each other, except for blocked variant labels with the blocked variant label. This hybrid approach aims to mitigate visual confusion risks involving variant labels, while reducing the

#	Topic	GNSO Recommendation	ccNSO (IDN ccPDP4)	Commentary
		(IDN EPDP)	circumstance and to be determined by the Panel) (in each direction)	computational complexity of comparing a large number of blocked variants against each other. The IDN ccPDP4 WG suggests a basic set, which shall be expanded by the panel factoring in likelihood of misconnection, scalability, and unwanted consequences. The IDN EPDP team is suggesting that the security and stability review panel may reduce some unneeded cases to reduce the comparison cases as needed. The string similarity review panel may decide not to include blocked variant labels in the comparison based on scripts and other criteria. Similarly, the IDN ccPDP4 WG is also suggesting the string similarity evaluation panel may add some needed cases as they see fit to include allocatable (and blocked, if needed) comparisons. In these cases, the two viewpoints converged based on the security and stability review. However, if the panels are different for gTLDs and ccTLDs, then learning from one may not be transferable to the other unless there are clearly documented guidelines for such cases. In addition, the ccPDP4WG proposes a three-step validation process, similar to the current process under the Fast Track process.
4.	Number of potential delegated variant TLD labels.	No ceiling value on how many Allocatable variant labels of a gTLD can be delegated. Up to four variant labels may be applied with the primary label without additional fee. (IDN EPDP)	Limitation to Delegatable variant strings of a selected IDNccTLD string. This selected string may already be delegated, for example under the IDNccTLD Fast Track rules.	The Security and Stability Advisory Committee (SSAC) in the SAC060 report asks for managing the number of delegated variant TLDs (and variant labels at the second level) as these can create many domain names due to permutation. Managing a large number of variant TLDs may prove to be difficult for registries, registrars, and registrants. The IDN EPDP team suggests developing guidelines for the management of IDN variant gTLDs.

#	Topic	GNSO Recommendation	ccNSO (IDN ccPDP4)	Commentary
5.	Single character TLDs	Allowed for Han script, but no application can be accepted until relevant guidelines developed by Han script community implemented (SubPro; IDN EPDP)	Single character not allowed at least until first review of policy.	Currently no consensus in script community with respect to single characters, nor immediate need considering requirement of only one IDNccTLD per Designated Language/script combination
6.	Delegation of successfully evaluated TLD and its variants TLDs.	The primary and variant TLDs must be delegated in the timeframe specified in the 2012 round (obligation to delegate within 12 months).	Delegation of the selected IDNccTLD string and its delegatable variants each must follow the relevant IANA procedures. May be at different points in time	For IDN gTLD a specific timeframe has been defined for application and delegation. Within this timeframe the IDN EPDP allows any sequence within a timeframe. For ccTLDs there is no timeframe specified so it may be possible to delegate a variant ccTLD well after the selected IDNccTLD was delegated or well before the primary IDNccTLD is delegated (however note that in principle a delegatable variant meets the same criteria as the selected IDNccTLD string).

The differences between the efforts from a ccPDP4 WG perspective

Scope of PDPs. The EPDP-IDNs and ccPDP4 each have a distinct remit. The ccNSO PDP is by definition limited to scope as defined in Annex B of the ICANN Bylaws. By definition registration policies for second level domains are out of scope.

Scope of the issues. The ccPDP4WG was tasked to review and update the ccNSO 2013 policy development effort, considering and building upon the experience of the Fast Track Process. The scope of the GSNO EPDP efforts was different and building upon earlier work of the GNSO (for example SubPro). Hence topics addressed by the EPDP Team are not addressed by ccPDP4WG and vice versa.

Principles or Design Criteria. The ccPDP4 proposals build on are guided by a set of very specific, generic principles or design criteria: on-going process, the IDNccTLD string should have a visual association with the name of a country, a subdivision or other area of geopolitical interest, and criteria determining the number of IDNccTLDs. As a result, the ccPDP4 proposals will be different when these principles come into play, for example the limitation of variants to Delegatable variants.

Annex F – Charter ccPDP4 Working Group

0. Contextual background information

In September 2013 the ccNSO submitted the IDN country code policy development process (ccPDP2) Board Report to the ICANN Board of Directors. The recommended policy ccPDP2 contains two parts:

- Proposals (at a high level) for the criteria and requirements for the IDNccTLD string selection and activities, roles, and responsibilities of the actors involved in the string selection and string evaluation processes and procedures.
- Proposals to enable the inclusion of IDNccTLDs in the ccNSO.

By mutual understanding, the ccNSO Council and the ICANN Board allowed the Fast Track Process to evolve, to test and gain experience with the policy aspects pertaining to the introduction of IDNccTLDs under the Fast Track Process. The aim was to further inform the overall policy, specifically with results of the different reviews of the Fast Track process[45]. The latest step in the evolution of the Fast Track Process was the introduction of the community developed Guideline regarding the Risk Mitigation Panel and related process.

In March 2019 the ccNSO Council tasked a team (Preliminary Review Team or PRT) to review ccPDP2 in light of and to review the impact of the following on the recommended policies:

- The evolved Fast Track Process,
- The request of the ICANN Board of Directors with respect to IDN Variants and
- Other relevant developments such as retirement of the (IDN) ccTLDs
- The inclusion of IDNccTLDs in the ccNSO.

The PRT was requested to advise the Council on whether to launch an additional Policy Development Process to address open issues, if any, or take other steps.

Based on its high-level analyses, the PRT identified various issues with the recommended policy for the selection of IDNccTLD strings and advised Council to launch a ccNSO Policy Development Process (ccPDP4) to address the various issues it had identified, including the deselection of IDNccTLD strings. With respect to the recommendations in ccPDP2 pertaining to the inclusion of IDNccTLDs, the PRT did not identify any issues and therefore advised the ccNSO Council to request a change of Article 10 of the ICANN Bylaws and Annex B. The Final Report of the PRT is included as part of ANNEX A of this Issue Report.

At its meeting on 22 August 2019, the ccNSO Council adopted the recommendations of the PRT. To implement these recommendations the ccNSO Council requested the ICANN Board of Directors to agree to take no additional steps with respect to ccPDP2 and to stop the evolution of the Fast Track Process[46]. In October 2019, the ICANN Board confirmed and agreed with this approach[47].

Since March 2019, and following the initial discussions of the ccNSO Council, input and feedback was sought from the community at the Kobe (ICANN64), Marrakesh (ICANN65) & Montreal (ICANN66) meetings. The community present at these meetings concurred with the view that (IDN) ccPDP4, should be launched and focus should be limited to the Items identified by the ccNSO Preliminary Review Team, namely on the (de-)selection of IDNccTLD strings and management of variants of selected IDNccTLD strings. The community also concurred and re-confirmed the ccPDP2

[45] See: https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf, general introduction page 4.
[46] https://ccnso.icann.org/sites/default/files/field-attached/sataki-to-chalaby-04sep19-en.pdf.
[47] https://www.icann.org/en/system/files/correspondence/chalaby-to-sataki-31oct19-en.pdf

recommendations to amend Article 10 and Annex 10 to allow the inclusion of IDNccTLD Managers in the ccNSO on equal footing.

1. Goal, Scope, and issues to be addressed

1.1 Goal

The goal of the working group (WG) is to report on and recommend a policy for the (de-) selection of Internationalized Domain Name country code Top Level Domain strings (IDNccTLDs) associated with the country codes assigned to countries, territories or other areas of geopolitical interest listed in the ISO 3166-1 standard and within the framework of the ccNSO Policy Development Process.

1.2 Scope

To achieve its goal, the WG shall initially focus on and be guided by the topics and issues listed below in section 1.3. If other topics and issues become apparent that are not listed and that in the view of the WG need to be addressed to achieve its goal, the WG should take these into consideration and inform the ccNSO Council and Issue Manager accordingly.

As this WG will undertake its activities within the framework of the ccNSO Policy Development Process, the limitations with respect to the scope of a ccPDP, specifically by Article 10 and Annexes B and C to the ICANN Bylaws shall also limit the scope of the WG's work.

If topics issues become apparent that are considered out of scope of the WG, the Chair of the WG shall inform the ccNSO Council and Issue Manager accordingly. If the ccNSO Council is also of the opinion it is outside the scope of the WG, it is expected to deal with it appropriately.

1.2 High Level overview of topics and Issues to be resolved

The main topics to be addressed are suggested by the PRT in its Final Report as adopted by the ccNSO Council. The detailed results of the PRT are mapped against section 2 the Board Report IDN ccNSO Policy Development Process[48], which contains the recommended policies on the IDNccTLD String Selection Criteria, requirements, and Processes (section 2.1) and Policy Proposals on the inclusion of IDNccTLDs in the ccNSO (section 2.2). This overview is included as Annex A of the Issue Report and provides the list of topics and issues that will need to be addressed. Note that for reference and to provide context, section 1 of the Board Report is included. Further note that - per advice of the PRT and as resolved by the ccNSO Council - section 2.2 of the Board Report are outside of scope of the work of this WG. Finally note that policy need to be developed to:
1. Include "variant management" as was also requested by the ICANN Board of Directors, and
2. Define the events which would cause the retirement policy as developed under the ccNSO Policy Development Process pertaining to the retirement of ccTLDs ccPDP3 part 1 to become effective.

2. The WG

2.1 Members and other participants of the WG

The WG is open to members who are representatives of ccTLDs, participants from other stakeholder groups, observers, and experts.

Members, participants, and experts commit to participate actively and regularly in the work of the WG and are expected to have at least a basic understanding of the reference material (section 7).

[48] https://ccnso.icann.org/sites/default/files/filefield_41859/idn-ccpdp-board-26sep13-en.pdf

Once appointed, all participants in the WG will be subscribed to a mailing list. The mailing list will be archived after closure of the WG.

The names and affiliation of the WG members and other participants will be published on a dedicated WG page on the ccNSO website.

At any time WG members, participants, observers, and experts may resign from the WG, by informing the Chair of the WG, who will then inform the ccNSO Council. After receiving a notification, the ccNSO Council may seek a replacement.

2.1.1 Members

The working group should have at least 10 members, at least from two (2) of the five (5) ICANN Geographic Regions. Members are representatives from ccTLD managers or their nominees. With respect to members of the WG there is no requirement for a ccTLD to be a ccNSO Member. Members are appointed by the ccNSO Council in accordance with the Guideline: ccNSO Working Groups[49].

2.1.3 Participants, experts, and observers to the WG

Participants

In addition, the WG is open to participants, who shall not be considered members of the WG. Participants are entitled to participate on equal footing with members, unless the charter states otherwise. The ccNSO Council will request the following stakeholders to appoint at least one participant:

- Each of the Regional Organizations as defined in Section 10.5 of the ICANN Bylaws;
- ALAC
- GAC
- GNSO
- SSAC

Experts to the WG

The ccNSO Council may also invite and appoint experts as advisors to the WG. Experts shall not be considered members of the WG but are entitled to participate on an equal footing in their area of expertise. The Council will at least invite the following persons:

- PTI staff
- Expert on the ISO 3166-1 list
- Relevant ICANN Staff

Observers

The WG will have the following observers:

- The Issue Manager for the ccPDP
- Any person appointed as observer by the Chair of the WG

***2.1.4* Subgroup Membership**. Members, participants, experts, and observers to the working group may - in addition to participating in the working group itself - participate in one or both two subgroups identified below. In addition, Representatives from ccTLD managers or their nominees, participants, experts and/or observers may select to participate in one or both subgroups only. The

[49] https://ccnso.icann.org/about/guidelines-working-groups-30mar16-en.pdf

rules for membership apply for such limited membership to the extent reasonable.

2.1.5 Staff Support

ICANN will be requested to provide adequate staff support to the WG

2.2 Chair and Vice-Chair

At the nomination of the members of the WG, the Chair and Vice-Chair of the WG will be appointed by the ccNSO Council. The Chair and Vice-Chair should be members of the Working Group.

The Chair together with the Vice-Chair, will manage the ongoing activities of the WG and ensure an appropriate working environment by:

- Promptly sharing relevant information with the entire WG.
- Planning the work of the WG to meet the WG goals and leading the WG through its discussions.
- Regularly assessing and reporting on the progress of the WG to the Council and broader community.
- Keeping track of WG participation. Where a WG member does not regularly participate, the Chair will reach out to the member to engage that person in the WG. If, after a conversation that member does not regularly participates, the Chair will advise the Council, so that further steps can be taken to resolve the situation.

The Chair is the representative of the WG. If the Chair of a WG is not a member of the ccNSO Council, the ccNSO Council will appoint a ccNSO Council liaison, to act as an intermediary between the WG and the ccNSO Council or invite the chair to Council meetings to regularly inform the Council on progress made, take questions, and participate in any deliberations related to the WG.

The Chair and Vice-chair will regularly inform the broader community on progress of the WG and seek (informal) feed-back from the community.

3. Operations of the WG

3.1 Working Methods

The first work item of the WG is to develop and agree on its working methods (Rules of Engagement) that will guide how the WG intends to conduct its business. These working methods will be made publicly available and be guided by the following principles:

- The meetings will rotate from a timing perspective to share the burden as the membership is distributed over different time zones.
- No firm decisions are taken during any single meeting without the substance of those decisions having been discussed and open for review / consideration by those that may not have been present during the meeting.
- Efforts should be made to ensure that non-native English speakers can participate on an equal basis in the discussions
- The WG will consider public comments and other input as appropriate, and at its reasonable discretion.
- The Secretariat will set up conference calls, maintaining mailing lists, etc. at the direction of the Chair and Vice-Chair of the WG. At the request of the Chair the Secretariat or other ICANN staff will also provide other forms of assistance, for example providing advice or an expert opinion.

3.1 Subgroups

The WG is expected to create at least two subgroups:

- subgroup 1 focusing on developing recommendations pertaining to the confusing similarity review process(es), procedures, criteria, and method(s) and
- subgroup 2 on variant management of IDNccTLD strings.

The Chair and vice-Chair of the WG are ex-officio members of these two groups and are tasked with inviting participants from the GNSO to the subgroups to coordinate the policy efforts undertaken by both the ccNSO and GNSO in the areas of confusing similarity and variant management. In coordinating the efforts, the subgroup is strongly advised to consider the requests from the Board in the area of Variant Management, and potential efficiencies and effectiveness in coordinating the policy efforts in the area of confusing similarity of TLD strings Each subgroup shall nominate their chair, who will be appointed by the Chair and Vice-Chair of the WG.

Subgroups shall submit their recommendations with respect to IDNccTLDs, including but not limited to the results of the coordinating efforts, to the working group to seek the support for the proposal (at a minimum at the level of consensus) from the WG membership. Only if supported by the WG membership, the subgroup proposals become part of the WG proposals and will be included in the Initial Report and Final Report.

3.2 Internal Decision making

In developing its output – guideline for operations, working method, work plan and any reports or papers - the WG shall seek to act by consensus. The Chair of the WG may make a call for consensus. In making such a call, the Chair should always make reasonable efforts to involve at a minimum all members of the WG. The Chair shall be responsible for designating each position as having one of the following designations:

- Full Consensus - a position where no minority disagrees; identified by an absence of objection
- Consensus – a position where a small minority disagrees, but most agree
- No Consensus

In the absence of Full Consensus, the Chair should allow for the submission of minority viewpoint(s) and these, along with the consensus view, shall be included in the report, paper, or other relevant deliverable.

In rare cases, the Chair may decide to use of a poll to assess the level of support for a recommendation. However, care should be taken in using polls: they should not become votes, as there are often disagreements about the meanings of the poll questions or of the poll results. Such a poll shall be open for the WG members only unless the Chair decides otherwise.

Any person on the WG who disagrees with the consensus-level designated by the Chair or believes that her/his contributions have systematically been ignored or discounted, should first discuss the circumstances with the Chair. If the matter cannot be resolved satisfactorily, the person should discuss the situation with the Chair of the ccNSO or a person designated by the Chair of the ccNSO.

If No Consensus can be reached by the WG, on policy recommendations, the Chair of the WG will submit a Chair's Report to the ccNSO Council and Issue Manager. In this report the Chair shall document the issues that are considered contentious, the process that was followed to try to reach a consensus position and suggestions to mitigate those issues, if any. If, after implementation of the mitigating measures, consensus still cannot be reached, the Chair shall prepare a Final Chair's Report documenting the processes that was followed to reach consensus and this Final Chair's Report will be deemed to replace the Final Paper. In this case, the ccNSO Council, advised by the

Issue Manager, may decide to close the WG, or take mitigating measures, for example changing the charter and reconstitute a WG based on the new charter.

3.3 Standards of Behavior
The persons on the WG are expected to behave in a mature and professional way when conducting their business on the WG. This includes, but is not limited to, communicating with the fellow membership professionally and ensuring that the WG remains inclusive and productive. To resolve incidents of non-professional communication the following steps should be followed:

- **Any concerns regarding the behavior of one of the members, participants, observers, or experts should first be raised with that person.**
- **If the issue is not satisfactorily resolved, a formal complaint may be raised with the Chair of the WG, who will attempt to mediate.**
- **If that is not possible, or if the complaint is sufficiently serious in nature, the Chair of the WG is empowered to restrict the participation of the person if in the chairs view the continued participation would not be appropriate and/or would seriously disrupt the working group from conducting its business.**
- **Generally, a person should first be warned privately, and then warned publicly before such the restriction is put into effect; only in extreme circumstances to be determined by the chair and vice-chair together, this restriction may be put in effect immediately.**

If a person on the WG disagrees with an imposed restriction, or the complainant disagrees with a restriction (or the lack of one), or there are other matters regarding the complaint that cannot be resolved satisfactorily, the participant, complainant, or the Chair of the WG may raise the issue with the Chair and Vice-Chairs of the ccNSO Council or their designate(s). They will review the matter and then decide. The ccNSO Council, WG Chair, WG person and complainant shall be informed accordingly.

4. Deliverables

4. 1. Working Method & Work Plan
The WG is expected to develop its working methods and a work plan first. The working methods should provide guidance on how the WG intends to conduct its business (see section 3.1). The work plan should include at a minimum, where feasible, timelines and expected outputs of the WG, based on the deliverables outlined in this Charter. Purpose of the work plan is to inform the community and ccNSO on the expected progress and anticipated schedule of public consultations.

Once the work plan is completed, the Timeline as set forth in section 6 shall be updated and published. If in the course of conducting its business the WG or the chair of the WG is of the view that the Timeline is untenable, the chair will inform the ccNSO Council and Issue Manager. The chair will then also suggest an adjusted Timeline to be adopted by the WG. Once adopted, the chair will inform the ccNSO Council and Issue Manager and the adjusted Timeline will be published.

4.2 WG Initial Report
The WG shall develop and publish for public consultation an Initial Report, which shall, at a minimum, include proposals to address the topics and issues identified in the Issue Report, and any documentation necessary to make the proposals effective. The Initial Report shall also contain a review and analysis of comments made on the Issue Report, if any, with respect to the issues raised in the Issue Report. The Initial Report shall be published for public consultation on the ICANN website following the guidelines for public consultations. The consultation should be scheduled in such a manner that it allows a public discussion with the relevant stakeholders at a designated ICANN meeting. The Chair of the WG will send the Initial Report to the Issue Manager of the ccPDP.

4.3 WG (draft) Final Report
After conclusion of the public consultation on the Initial Report, the WG shall prepare a (draft) Final Report reflecting the Initial Report, and the comments received on the Initial Report during the public consultation period.

If the WG is of the view that an additional public consultation is appropriate, it will prepare a draft Final Report to be published for public consultation on the ICANN website and following the guidelines for public consultations. The consultation should be scheduled in such a manner that it also allows for a public discussion with the relevant stakeholders at a designated ICANN meeting. After conclusion of the public consultation on the draft Final Report, the WG shall prepare its Final Report that reflects the draft Final Report, the comments received and how they have been taken into consideration by the WG, if at all.

The Final Report will include the proposed policy recommendations. This Final Report shall be published within fourteen (14) days after adoption of the Report by the WG and conveyed to the Chair of the ccNSO and the Issue Manager of the ccPDP. The Chair of the ccNSO shall request the Chair of the GAC, opinion, or advice from the GAC.

5 Miscellaneous
5.1 Omission in or unreasonable impact of Charter

If this charter does not provide sufficient guidance and/or the impact of the charter is found to be unreasonable for conducting the business of the WG, the Chair has the authority to determine a proper course of action to mitigate the issue. Such action may, for example, consist of a modification to the Charter to address the omission or its unreasonable impact, in which case the Chair(s) may propose such modification to the ccNSO Council and Issue Manager. A modification shall only be effective after adoption of the amended by the ccNSO and after publication of the amended Charter. The chair of the WG shall exercise reasonable discretion with respect to question as to whether this charter does not provide guidance and/or the impact of the charter is unworkable with respect to the conduct of business of the WG.

5.2 Closure of the Working Group
If the WG determines that it has completed its work, or if the WG cannot achieve its goal(s), The Chair of the WG will submit a Final Chair Report to the ccNSO Council and Issue Manager. This report should include a recommendation on the time to close the WG.
A WG is closed by a resolution of the ccNSO Council.

6. WG Timeline

Step	Event		Entity	Tentative Date completion	Comment
1	**Draft Issue Report**		Issue Manager	February 2020	To be presented to the prior to the Cancun meeting
2	**Formal Initiation of ccPDP 4**		ccNSO Council	February 2020	Following public comment ccNSO Council vote
3		**Public notification of Initiation of IDN ccPDP**	Issue Manager	February 2020	Notification of initiation of the ccPDP4 to the Website

Step	Event		Entity	Tentative Date completion	Comment
					and to the other ICANN Supporting Organizations and Advisory Committees. Open comment period (in accordance with the PDP Timeline) and at a minimum 40 days.
4		**Notification of and appointment by Regional Organizations of a representative**	Issue Manager	April 2020	Each representative of a Regional Organization shall be asked to submit a Regional Statement to the Issue Manager as part of and within the time designated in the PDP Timeline.
5		**Formal request to Chair of the GAC to offer opinion or advice**	ccNSO Council	April 2020	
6		**Formation of Working Group under ccPDP**	ccNSO Council	April 2020	As part of the ccPDP4, create a Working Group will be established
8		**Interim Papers**	ccPDP4 WG	November 2020	Various papers (sub) WG to be concluded at ICANN 69 (Hamburg) to be initially presented at ccNSO meeting
10	**Initial Report**		ccPDP4 WG	December 2020	Combined version of Interim papers. Public comment period of at least 40 days
11	**Draft Final Report**		ccPD4 WG & Issue Manager	February 2021	Publication Final Report of containing the recommendations to resolve issues as identified in Issues report, public comment of 40 days
17	**Adoption Process**				Adoption process ccNSO, including ccNSO membership vote.
		Adoption Final Report by WG	Issue Manager	May 2021	Ensure the Final Report reflects

Step	Event		Entity	Tentative Date completion	Comment
					consensus of the WG on recommended policy
18		**Submission of Final Report to the ccNSO Council**	Issue Manager	May 2021	Preferably in time for ICANN's community forum FY 21
19		**Invite the Chair of the GAC to offer opinion or advice**	ccNSO Council	May2021	Preferably in time for ICANN's community forum FY 21
20		**ccNSO Council Adoption of Final Report**	ccNSO Council	June 2021	After GAC has had opportunity to Advise or share its opinion.
21		**First round ccNSO members vote**	ccNSO Members	To be completed post Policy Forum June 2021	Note: the members vote is subject to quorum rule (at least 50 %) of the members need to have cast a vote.
		Council decision to adopt Board Report	ccNSO Council	October 2021	Board report needs to include the results of members vote.
22	**Submission Board report**	**Board Report**	ccNSO Council	November 2021	

7. References

- RFC 1591 (https://www.ietf.org/rfc/rfc1591.txt)
- ISO 3166 standard (http://www.iso.org/iso/country_codes)
- The ccNSO Framework of Interpretation working group Final Report, (http://ccnso.icann.org/workinggroups/foi-final-07oct14-en.pdf)
- The Fast Track Implementation Plan and related documents, latest version (see: https://www.icann.org/resources/pages/fast-track-2012-02-25-en)
- The draft policy for the selection IDNccTLD strings (September 2013) (https://ccnso.icann.org/en/announcements/announcement-26sep13-en.htm)
- The Final Report of the IDN policy preliminary review team (June 2019) (https://ccnso.icann.org/en/workinggroups/final-report-idn-prt-29jul19-en.pdf)
- The Board resolution on IDN (cc)TLD Variants (14 March 2019) (https://www.icann.org/resources/board-material/resolutions-2019-03-14-en#2.a) requesting the ccNSO to work on Variant Management and related relevant material (see: https://www.icann.org/resources/pages/idn-variant-tld-implementation-2018-07-26-en)
- Relevant resolutions of the ICANN Board of Directors as documented in the report
- Relevant correspondence between the ccNSO and ICANN Board of Directors.
- Issue report ccPDP4

Annex G: Contributors to the ccPDP4 IDN String Selection Working Group

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Alireza Saleh (.ir)
Anil Jain, (.in) - **Vice-Chair**
Anna Karakhanyan (.am)
Ben Lee (.hk)
Daniel Kalchev (.bg)
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Jiankang Yao (.cn)
Kenny Huang (.tw) - **Chair**
Kristina Hakobyan (.am)
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Patrik Fältström (SSAC) - withdrew 5 May 2023
Andrei Kolesnikov (SSAC) - withdrew 5 May 2023
Ram Mohan (SSAC) - withdrew 5 Mat 2023
Omer Mohamed Fadul (GAC)
Mohammad Mamun Or Rashid
Raphael Beauregard-Lacroix (GNSO-NCUC) (former)
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