

15th July 2009

To ICANN:

APTLD is pleased to submit comments to you on the **3rd Revision of the IDN ccTLD Fast Track Implementation Plan**.

We support the IDN ccTLD Fast Track initiative and are eager to see it being implemented as soon as possible, not least within the timeline already published. Our specific comments regarding the 3rd Revision of the Implementation Plan are as follows:

(1) Documentation of Responsibility (“DoR”)

In the "Proposed Implementation Details Regarding: Arrangement between ICANN and prospective IDN ccTLD managers (29 May 2009)", a mechanism of "*express acceptance of specific terms and conditions describing the TLD obligations when signing the TLD request*" was proposed.

We note that many of the existing ASCII ccTLD registries have been administering their domains successfully for a long time without a formal agreement with ICANN or IANA. Similarly, registries of IDN ccTLDs should not be required to sign a formal agreement (DoR) before they can operate their IDN ccTLDs.

In our view, the approach of ICANN encouraging the ccTLD manager to enter into a DoR or other form of agreement on a voluntary basis should be more palatable for ccTLDs. We would support such an approach.

(2) Variant Strings

In the "Proposed Implementation Details Regarding: Development and use of IDN Tables and Character Variants for 2nd and Top Level Strings", our views on variant strings are that they should be delegated to the same IDN ccTLD Manager who, for practical reasons, should have the prerogative to choose which variant strings it wants to be active and which it wants to be blocked. There are genuine needs for certain countries and territories to deploy both the normal string and variant strings as their IDN ccTLDs. The IDN Registry would then be able to offer the active strings to end-users when they apply for an IDN domain. Any possible issues at the second and third levels caused by use of variant strings at the top level should be left to the registries to resolve either technically or by adopting certain policies.

(3) Cost

In the "Proposed Implementation Details Regarding: Financial contributions to Support the Development and Deployment of IDN ccTLDs", ICANN has identified three cost components:

1. Cost associated with processing requests for new IDN ccTLDs;
2. On-going IDN ccTLDs support costs; and
3. Relevant costs associated with development of the overall IDN programme and the Fast Track programme.

Component 1. is considered in more detail in (4) below. For component 2, there needs to be greater clarity and transparency. For component 3, development costs have already been expended by ICANN. Individual ccTLDs have also incurred their own development costs. Going forward, it would seem unfair for ICANN to include its development costs into the proposed cost contribution model for IDN ccTLDs.

We acknowledge the Security & Stability Advisory Committee's work towards standardizing the display and usage of "Internationalized Registration data". Even though no standards or guidelines exist for internationalized registration data, some ccTLDs in Asia-Pacific have invested in WHOIS for IDN development & deployment and will continue to invest in the future upgrades, where necessary. Such significant amount of investment should also be taken into consideration by ICANN.

(4) Pre-arranged, Recommended Contributions

In the "Proposed Implementation Details Regarding: Financial contributions to Support the Development and Deployment of IDN ccTLDs", the term "*pre-arranged and recommended contributions*" is used. This term is somewhat unclear and confusing but it seems to suggest that contributions by IDN ccTLD registries are actually voluntary. Greater clarity is therefore desirable. If the intention is to have the contributions voluntary, we would support it. Our rationale is as follows:

Firstly, for consistency, IDN ccTLDs should still be similarly treated as ASCII ccTLDs and hence contributions should remain voluntary.

Secondly, unlike gTLD registries which are profit-making, many ccTLD registries are non-profit in nature. In the Asia Pacific region, many ccTLDs are small and require regular sponsorship to continue to operate. Also, some registries do not plan to charge for their IDN ccTLDs, or charge nominally only. The intention of these ccTLDs is to bridge the digital divide that exists in many parts of the region. Imposing a compulsory fee is tantamount to depriving countries or territories of their rights to have their ccTLDs in their own languages.

Finally, as mentioned above, many ccTLDs (e.g. those involved in the Chinese Domain Name Consortium) have already expended costs in relation to developing technical standards and implementations for IDNs for their respective communities. In a number of instances these solutions are being shared with others in the Internet community, including gTLD registries, without charges or cost recovery. It would be unfair to now impose a compulsory fee on these registries.

(5) Revision of IDNA Protocols

The IDN ccTLD fast-track process should not be held back by the coming revision of the IDNA protocol. Protocols are never perfect and revisions occur every now and then. The Chinese domain name communities have launched their Chinese domain names at the second level based on earlier versions of the protocol with no problems or issues. The need for a stable system is recognised and the ccTLDs are sufficiently responsible to ensure that the protocols implemented do not endanger the stability of the Internet.

About APTLD

The Asia Pacific Top Level Domain Association is an association of country code top level domains ("ccTLD") managers, and other organisations that have an interest in ccTLDs, in the Asia-Pacific region. Our aim is to assist our members to operate world class ccTLDs.

Thank you for the opportunity to make this submission.

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