JIG (Joint ccNSO/GNSO IDN Working Group) Response to ICANN Board Resolution on Single Character IDN TLDs

Dear ICANN Board,

First of all, we appreciate activity at the ICANN Board regarding Single Character IDN TLDs. In response to the August 2011 resolution (http://www.icann.org/en/minutes/resolutions-25aug11-en.htm#5) however, we express our disappointment and concern on 3 critical aspects:

1. Both the ccNSO and the GNSO councils have at multiple occasions expressed a consensus principle that the introduction of IDN gTLDs or IDN ccTLDs should not be delayed because of lack of readiness of one category. The August 2011 Board resolution (by specifying that "processes for delegation of single-character IDN TLDs will be made available after the first gTLD application round and conclusion of IDN ccTLD policy work.") perhaps inadvertently conflicted with this community consensus understanding and should be rectified and/or clarified.

2. The issue of Single Character IDN TLDs have gone through at least 4 rounds of community discussions, including at the GNSO IDN WG (http://gnso.icann.org/drafts/idn-wg-fr-22mar07.htm), the GNSO Reserved Names WG (http://gnso.icann.org/issues/new-gtlds/final-report-rn-wg-23may07.htm), incorporated into the GNSO New gTLD recommendations (http://gnso.icann.org/issues/new-gtlds/pdp-dec05-fr-parta-08aug07.htm), and of course the JIG report (http://ccnso.icann.org/workinggroups/jig-final-report-single-character-idns-30mar11-en.pdf). Each time there is consistent consensus support from the community for allowing Single Character IDN TLDs in the new gTLD process (including the first round), and no objections were received from any of the ACs. The August 2011 Board resolution specifying that Single Character IDN TLDs not be included in the first round ignores this repeated community consensus without reasonable rationale.

3. While the August 2011 Board resolution generally requested input from a collection of ACs, there is a lack of progressive direction towards the implementation of Single Character IDN TLDs. Furthermore, while input from ACs is always welcome, given the multitude of public comment periods already conducted for the subject, including participation from SSAC members, with consistent consensus response, such consultation with ACs should not become an arbitrary hurdle for the implementation of Single Character IDN TLDs, especially for the New gTLD process.

Single Character IDN TLDs is not simply a "good to have" feature, but a necessary requirement for some of the IDN communities in order to allow broadly attractive and competitive gTLDs. As an example, for Chinese IDN TLDs, the prohibition of Single Character IDN TLDs would effectively devoid the community of single-syllable-single-word TLDs, which is otherwise acceptable for English and other alphabetic based language TLDs (e.g. ".word" would be an acceptable ASCII single-syllable-single-word TLD, yet a similar single-syllable-single-word TLD ".字" would not be acceptable for Chinese), creating an unjustified situation of inequity, and significantly hindering the adoption of IDN.

The JIG, through the ccNSO and GNSO councils therefore sincerely urges the Board to:

a. Implement the community consensus of allowing Single Character IDN TLDs without restricting such implementation to being after the first round of the new gTLD process, and to decouple the requirement that IDN ccTLD or IDN gTLD mechanisms wait for the other;

b. If necessary, form an implementation team to assist staff in immediately implementing Single Character IDN TLDs for scripts and languages where the input of a Single Character requires multiple keystrokes (e.g. ideographical scripts, and avoiding the potential technical concern of keyboard layouts identified in the JIG report), and for the team to further guide implementation for other scripts as well as coordinate input from the ACs; and,

c. Update or amend the New gTLD Applicant Guidebook for such implementation before the application period for the first round is over.

The JIG and the significantly affected language communities are prepared to support ICANN staff and Board in the swift implementation of Single Character IDN TLDs without compromising the security and stability of the Internet. The JIG further believes that minor adjustments to the Applicant Guidebook would suffice and is ready to work with staff closely to complete its implementation.

We look forward to the positive response and actions from the Board.

Sincerely,

ccNSO Council (approval: [LINK])
GNSO Council (approval: [LINK])
JIG -- Joint ccNSO/GNSO IDN Working Group