## **ALAC Statement on Interim Report of the Internationalized Registration Data Working Group**

On 15th November 2010, the joint Internationalized Registration Data Working Group (IRDWG) published the Interim Report of the Internationalized Registration Data Working Group seeking inputs from the community on Internationalization of Registration Data.

After reviewing the report, the ALAC is pleased to submit the following comments:

First, we would remind the community that Whois was historically designed as a tool to facilitate coordination in order to find the contact person responsible for the domain name for administrative and technical problems.

While the uses of Whois now extend beyond what it was originally designed to be, for instance as law enforcement, there is continuous debate within the community about what information should be provided by Whois and what should not be. It is a challenging balance between the two.

In principle, we believe Whois should provide as much useful information as needed but no more.

Deriving from the above principle,

1) It is important that IRD provides useful contact information, for example, the address should be in International Mailing Address Format (IMAF). While IMAF varies from country to country, it is commonly written in US-ASCII.

As such, we support IRD to include a "MUST BE PRESENT" script (ie. US-ASCII).

2) Transliteration generally produces not much more useful contact information.

Particularly, it is unlikely you will be able to use a transliterated address on an envelope for "snail mail".

As such, we do not believe that transliteration should be mandatory in IRD. Instead, there are numerous off-line transliteration tools that are available for the task, for whatever little information they may yield.

In conclusion, we support the proposed Model 1, that IRD should provide contact information mandatorily in US-ASCII whereas local script can be provided optionally.