

**From:** [ccNSO-Tracker](#) on behalf of [Katrina Sataki](#)  
**To:** [Cyrus Namazi](#)  
**Cc:** [Goran Marby](#); "[Nigel Roberts](#)"; [merike.kaeo@board.icann.org](mailto:merike.kaeo@board.icann.org); [Sarmad Hussain](#); "[Chris Disspain](#)"; [Steve Sheng](#)  
**Subject:** [ccNSO-Tracker] Risk Mitigation Assessment  
**Date:** Thursday, February 28, 2019 8:13:14 AM  
**Attachments:** [Guideline for Risk Mitigation Measures Evaluation.pdf](#)  
[EU-GREEK-MitigationMeasures.pdf](#)  
[ATT00001.txt](#)

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To: Cyrus Namazi, President Global Domain Division

Cc: Chris Disspain, Nigel Roberts, ccNSO appointed Board members; Merike Kaeo, SSAC Liaison; Göran Marby, CEO ICANN

Date: 28 February 2019

Subject: Risk Mitigation Assessment

Dear Cyrus

In response to the request of the President of GDD, dated 6 December 2017, the joint ccNSO and SSAC working party has completed its review and update of the Guideline for the evaluation of the risk mitigation measures (the 'Guideline'). This community-developed Guideline implements changes to the IDN ccTLD Fast Track process as adopted by the ICANN Board of Directors in October 2017. This brings the community's work on this issue to a close, and we hope that updated Guideline will become effective soon.

In addition, the working party has tested the Guideline against a real life case, the .eu in Greek script, which is the only outstanding case currently in the IDN ccTLD Fast Track process. After concluding the (re-)design of the Guideline to include risk mitigation process and procedures, we asked EURid, the requester of .eu in Greek, to propose mitigation measures to address the identified risks of confusing similarity. Following the invitation, EURid proposed several mitigation measures to address the possible risks associated with the introduction and use of .eu in Greek as a Top Level Domain (included). We are confident that those measures will minimize any risks associated with possible confusingly similar strings to an acceptable level and may be used as example in the future.

As an additional safeguard, the updated Guideline maintains the security and stability of the internet's system of unique identifiers by ensuring that the registry is held accountable for applying the mitigation measures that they have proposed. The working party proposes that, following deployment, this specific test-case is monitored in the real environment by ICANN appointed staff. In the unlikely event that unforeseen, major issues arise, the proposed registry accepts the risk to re-delegate the domain to a reserved status. We propose a two-year period of review of this case, commencing immediately.

Furthermore, once the current pending case under the IDN ccTLD Fast Track Process is resolved, we suggest the complete process and procedures relating to the evaluation of confusing similarity be

reviewed and evaluated, with a two-fold goal. Firstly, at the beginning the process and procedures for evaluation of strings of the new gTLD round and the overall policy for IDN ccTLDs were supposed to be consistent. However, due to the incremental changes of the ccTLD Fast Track process since 2009, the discrepancy between these procedures has increased. Secondly, since the original method for the evaluation of the string similarity has evolved, scientific insights in this area have developed and, therefore, a review of the original approach is highly desirable.

To sum up, we recommend that ICANN - either the ICANN Board of Directors or ICANN Org – take a final decision about the one and only pending case under the Fast Track Process on the basis of the amendments of IDN Fast Track Process approved in October 2017 and of the results of our work, the amended guideline and test. This recommendation is supported by the ccNSO Council and with no objection by SSAC.

We also remain available to work together with the relevant constituencies not only to review the IDN ccTLD Overall Policy, but also to introduce and ensure consistency of policies and procedures relating to TLDs, such as the assessment of possible confusing similarity among different strings.

On behalf of the joint ccNSO-SSAC Working Party,

Katrina Sasaki, Chair Country-Code Names Supporting Organization (ccNSO) Council  
Rod Rasmussen, Chair Security and Stability Advisory Committee (SSAC)  
Patrik Fältström, Ex-chair SSAC

Attachments:

- Guideline for Risk Mitigation Measures Evaluation;
- A Case Study and Evaluation of a Sample Risk Mitigation Plan