

## **IDN ccTLD Fast Track Process – historical overview**

### **Launch, Q4 2009**

The approval of the IDN country code Top-Level Domain (ccTLD) Fast Track Process by the ICANN Board at its annual meeting in Seoul, South Korea in October 2009<sup>1</sup>, enabled countries and territories to submit requests to ICANN for IDN ccTLDs representing their respective country or territory names in scripts other than US-ASCII characters. A country or territory represented on the ISO3166-1 list is eligible to participate in the IDN ccTLD Fast Track Process and to request an IDN ccTLD string that fulfills the additional requirements defined in the Final Implementation Plan for IDN ccTLD Fast Track Process (FIP) (Annex 1. See <http://www.icann.org/en/topics/idn/fast-track/idn-ccTld-implementation-plan-16nov09-en.pdf>).

When the ICANN Board of Directors approved the FIP, they also directed the staff "to monitor the operation of the IDN ccTLD Fast Track Process at regular intervals to ensure its smooth operation, and, subject to Board review, update the process when new technology or policies become available, with the goal to efficiently meet the needs of Fast Track Process requesters, and to best meet the needs of the global Internet community.

### **First review (2010-2011)**

The review was announced on 22 October 2010. The public comment period ran from 22 October to 17 December 2010 and was subsequently extended to 31 January 2011 at community request. The archive of received public comments can be found at: <http://forum.icann.org/lists/fast-track-review-2010/>.

A public session was held during the ICANN meeting in Cartagena on 6 December 2010 to discuss how well the process was functioning for the community. Information about this session can be found at: <http://cartagena39.icann.org/node/15415>

The recommendations should be considered as initial feedback to the community. All comments and the resulting recommendations for changes to the Fast Track Process were provided to the ICANN Board for its consideration and decision at their meeting during the ICANN Silicon Valley meeting in San Francisco, USA, March 2011. Following ICANN Board consideration, changes and actions were implemented by ICANN staff through an implementation plan.

To help initiate discussion, a list of potential topics was provided for the review, which included:

- Transparency
- Community Support
- Meaningfulness
- Determination of the IDN ccTLD Manager
- IDN Tables
- Confusingly Similar Strings
- Disputes and objections/reevaluation rights

ICANN received input on the IDN ccTLD Fast Track Review from individual Internet users, the DNS technical community, APRALO, the Hong Kong Internet Registration Corporation and the country code Names Supporting Organization. An analysis of these comments along with the

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<sup>1</sup> "Resolved (2009.10.30.11), the ICANN Board directs staff to launch the IDN ccTLD Fast Track process as detailed in the Proposed Final Implementation Plan, beginning at 00:00 UTC on 16 November 2009;"

ICANN recommendations was provided in the report available at <https://www.icann.org/en/system/files/files/fast-track-review-summary-comments-18feb11-en.pdf>

To sum up the comments:

1. A large number of comments were received from individuals and entities in the Bulgarian Internet community, asking that ICANN re-evaluate the Bulgarian IDN ccTLD request for .bg in Cyrillic. Many questioned the transparency of the decision that found the applied for Bulgarian string was too similar to .br. Several commenters proposed that the requested string is not confusable with ".br." The commenters further proposed that because the proposed string is not confusable with .br, the applied-for string should be accepted by ICANN within the Fast Track Process. Alternatively, the Country Code Names Supporting Organization (ccNSO) stated that disputes and objection/re-evaluation are policy issues that should not be addressed through an amendment to the FastTrack Process.
2. The ccNSO, APRALO, HKIRC and Jothan Frakes commended the successful launch of the Fast Track process. The ccNSO and HKIRC noted that the transparency in the process was appropriate and maintaining confidentiality during string evaluation allows requesting countries and territories to resolve issues of public authority and community-support without undue politicization of the process.
3. Several members of the DNS technical community noted issues with the treatment of IDN tables. One comment suggested that it was time for ICANN to stop publishing the IANA Repository. Several noted that this inserts ICANN into registry naming policy. The ccNSO stated that this was a policy issue not appropriately addressed in ICANN implementation processes. One comment stated that ICANN should not engage in or actively foster the management of IDN tables.
4. Several commenters noted that the Fast Track was intended to be for clear cases and non-controversial requests. If the Fast Track process is to continue, issues with confusable strings as mentioned in the comments, will continue to arise.
5. Several commenters raised the issue of delegating variant TLDs.

Community input provided in the first annual review resulted in several public sessions and the formation of a sub-group within ccNSO PDP Working Group 1. This sub-group was tasked by the ccNSO to provide guidance and clarifications on the interpretation of the rules for handling cases of string similarity in the IDN ccTLD Fast Track Process. A specific recommendation was proposed during the Dakar ICANN meeting in October 2011, and the ccNSO adopted a resolution recommending that the ICANN Board approve an amendment to the Fast Track Implementation Plan in order to provide further guidance for a specific case of string similarity. On 8 December 2011, the ICANN Board of Directors approved the amendment to the IDN ccTLD Fast Track Process Implementation Plan.

The revised FIP version was published on 15 December 2011 (Annex 2 and available at: <http://www.icann.org/en/resources/idn/fast-track/idn-cctld-implementation-plan-15dec11-en.pdf>). The main changes were relating to the procedure to be followed in case the DNS Stability Panel determines a requested IDN ccTLD string is confusingly similar to an existing two letter ASCII ccTLD corresponding to the same country or territory as the requesting country or territory entity. In this case, and with the necessary documentation supplied by the relevant authorities – including, but not limited to intended manager agreement to specific and prearranged conditions with the goal to mitigate the risk of user confusion as of the moment the IDN ccTLD becomes operational - the requested string is deemed to have passed the DNS Stability Panel evaluation.

## Second review (2012)

The second, annual review of the IDN Fast Track process started with a public comment period on 9 April. The public comment ended on 30 April and the ICANN staff report on the received comments was produced on 4 June 2012.

To help initiate the discussion, ICANN staff listed the following topics, but all aspects of the Fast Track Process were under review.

- **String Similarity:** The evaluation of string similarity continues to be a topic of discussion in the ICANN community. The final Integrated Issues Report published by the IDN Variant Issues Project recommended string similarity as an area where further work is needed. Another recent publication from SSAC, SAC052 report pointed out that further review and modifications of the String Similarity Review processes are clearly required to reduce ambiguity and increase consistency in the process.  
As described in the Final Implementation Plan for IDN ccTLD Fast Track Process, the DNS Stability Panel reviews strings for confusability with existing ISO-3166-1 two-letter codes, TLDs, other TLDs requested in the IDN ccTLD Fast Track Process, and applied-for strings in the new gTLD Process. The panel has successfully completed the assessment of string similarity for 46 strings to date.  
ICANN is committed to upholding the community's directive to not delegate confusingly similar strings. In addition to fulfilling the processes identified in the Final Implementation Plan, we ask community members, specifically those who were directly involved in the Fast Track Process, to provide us with feedback on how we may increase the predictability.
- **Viability of an Appeal Process:** Currently, there is no appeal procedure in the IDN ccTLD Fast Track Process, because it was assumed the process was developed for a limited number of non-contentious IDN ccTLDs associated with the ISO 3166-1 two-letter codes. Should the community determine that an appeal process is required for the Fast Track Process, it will become necessary to articulate the structure and specifics of such a process, taking into account the overarching principles of transparency and accountability of the evaluation process, maintaining the security and stability of the DNS, and respecting the specific requirement proposed by the IDNC WG that the evaluation process is confidential.
- **IDN Tables:** The topic of IDN tables was considered in the initial Fast Track Review, and no change was made. On the broader subject of treatment of IDN tables, the first annual review recommended that the role and effect of IDN tables be redirected to other areas of work such as Variant IDN TLDs Project.  
Such feedback from the community about IDN tables, as well as discussions in last year's work on the Variant Issues Project resulted in commencing work on an Internet Draft, which specifies a universal IDN table format based on XML. The intention for this format is one that can fully express the spectrum of IDN table rulesets that are known to be in deployment, such as those used in the CJK and Arabic script communities. It is expected this effort will improve the utility of the contributed tables, as well as potentially provide mechanisms by which tables may be used or adapted for use in the root zone, based on the outcome of the other streams of variant work. More information on this will be available to the community through regular updates on the IDN Variant Project.
- **Review Period:** Currently, the Fast Track Process Final Implementation Plan requires that the process undergo review annually. Given that the volume of requests in the IDN Fast Track Process is expected to be at a smaller rate than when it was first launched, ICANN staff propose the review period be changed from annually to biannually or an as-needed basis.

The FIP version revised on 4 June 2012 (Annex 3 and available at: <http://www.icann.org/en/resources/idn/fast-track/idn-cctld-implementation-plan-04jun12-en.pdf>) introduced only edits in the text of the Plan that remained unaltered against the 2011 version.

### **Update Fast Track Implementation Process at request of the ccNSO Council (2013)**

To cope with increasing requests regarding the introduction of an appeal process in case of applied-for string rejection by the DNS Security and Stability panel, and to acknowledge the need to provide the assessment of the applied-for string with a more sound scientific approach for the confusing similarity aspect, the ccNSO Council, after conclusion of the development of the IDN overall policy development process, requested the ICANN Board to include a second review procedure (the Extended Process Similarity Review). The ccNSO work has taken into account the experiences and reviews of the IDN ccTLD Fast Track Process as well as the Governmental Advisory Committee's advice on the matter.

Following this request and taking into account the related GAC Advise from the Toronto meeting, on 27 June 2013, the ICANN Board approved an amendment to the IDN ccTLD Fast Track Process Final Implementation Plan.

The amendment implements a two-panel process for string similarity review in the IDN ccTLD Fast Track Process, and was proposed following the conclusion of the IDN Country Code Names Supporting Organization (ccNSO) Policy Development Process (PDP) as well as a request from the ccNSO to implement the string similarity review process as recommended in the PDP within the Fast Track Process.

The ICANN Board also resolved on 27 June 2013 that all pending and future IDN ccTLD Fast Track requesters whose strings are considered not valid per the string similarity assessment of the DNS Stability Evaluation, had the option to request a second and final evaluation by the new Extended Process Similarity Review Panel (EPSRP).

The current version of FIP, revised on 5 November 2013 (Annex 4 and available at: <https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-05nov13-en.pdf>) was complemented by the EPSRP guidelines (available at <https://www.icann.org/en/system/files/files/epsrp-guidelines-04dec13-en.pdf>) that were developed by ICANN staff.

### **Third review (2015)**

On 15 January 2015, ICANN opened a public comment forum for the annual review of the IDN ccTLD Fast Track Process. The input received will be used to determine appropriate updates to the current version of the Final Implementation Plan of the IDN ccTLD Fast Track Process (FIP) and for the proposed IDN ccTLD policy, which is currently under consideration.

This review was partly triggered by the findings of the EPSRP with respect to 3 rejected IDN ccTLD strings in September 2014<sup>2</sup>. In one case the EPSRP found EPSRP that a decision in case of mixed outcome between upper and lowercase is a policy matter.

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<sup>2</sup> <https://www.icann.org/resources/pages/epsrp-reports-2014-10-14-en>

To help initiate the feedback process on the review of the IDN ccTLD Fast Track Process, ICANN staff has listed the following topics as ones that can benefit from further discussion. However, the review is not limited to these aspects.

- Upper case U-Labels in the context of string similarity. The string similarity evaluation was implemented in the original FIP based on the recommendations of the Internationalized Domain Names Working Group (IDNC WG). It was introduced to minimize the risk of end-user confusion due to similarity between two strings. Minimizing the risk of string confusion has at least two distinct functions: (i) provide a predictable user experience, where user can unambiguously use a domain name "in common fonts, in small sizes at typical screen resolutions", and (ii) contribute to a secure user experience, where user is protected from the possible spoofing and phishing threats. String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, as stated in *Section 5.5 String Confusion and Contention* of the current FIP.

For the scripts using both upper and lower case letters, IDNA2008 protocol generally disallows the use of upper case letters in a valid U-Label. However, the end-user can still input letters in upper case form for a U-label in applications, which can then map upper case forms of the letters into their lower case forms for further processing, as also discussed in the informational RFC 5895 and RFC 5992 Appendix A. Many applications, like browsers, implement such mapping from upper case to lower case for different scripts, e.g. for Greek and Cyrillic. Thus, both the upper case and lower case letters remain relevant to the discussion around string similarity.

Based on the context, community feedback is sought on whether upper case forms of U-Labels, where such labels are disallowed by IDNA2008 protocol, should be considered relevant for the string similarity review of IDN ccTLD labels. Further, as ASCII TLDs may also be used in upper case or lower case, for string similarity purposes, should the applicable form(s) of U-labels be compared with both upper case and lower case forms of labels in ASCII?

- Viability of EPSRP as a second review. On 27 June 2013, the ICANN Board approved the proposed amendments of the FIP to implement a two-panel process for string similarity review in the IDN ccTLD Fast Track Process. The first string similarity review was maintained as a function of the external and independent DNS Stability Panel, also acting as the "Similarity Review Panel". To provide a second and final similarity review of the string(s) found to be confusingly similar by the "Similarity Review Panel", and using a different framework, an external and independent "Extended Process Similarity Review Panel" (EPSRP) conducts a review of the requested IDN ccTLD string, only if so requested by the applicant. The EPSRP reviews the requested string(s) on the basis of the framework described in the Guidelines for the Extended Process Similarity Review Panel and with experimental details and results as available in the reports published for the first set of evaluations.

Due to the nature of the methodology, it takes significant time and effort to design the experiments, collect and analyze the data and publish the results. In the current phase, it has taken a team of four experts up to eight months to conduct the first set of evaluations for three strings, requiring more than 400 person-hours for designing, conducting and reporting on the experiments. The methodology has been clearly documented, for independent verification, along with detailed experimental results, providing added transparency in the process.

The community is invited to comment on the effectiveness of the EPSRP methodology in terms of the experimentation designed, results achieved and the transparency provided. How effective is the EPSRP method in terms of the time taken and effort required? Should this methodology be taken forward or revised? In the latter case, in what ways?

- Inclusion of Name Collision in the Fast Track Process.
- Using machine readable XML format for IDN Tables.

The report on the comments received by ICANN was produced by ICANN staff on 17 March 2015 and is available at <https://www.icann.org/en/system/files/files/report-comments-idn-ccTLD-fast-track-17mar15-en.pdf>. Only one comment was received during the comment timeframe.

### **Proposed Guidance and Review of the EPSRP guidelines (2015)**

Following the finding of the EPSRP (see above) and the comment receive, at its meeting on 25 June 2015 the ICANN board of Directors requested *“the ccNSO, in consultation with other stakeholders, including GAC and SSAC, to provide further guidance on and refinement of the methodology of second string similarity review process, including the interpretation of its split recommendations, to be applied to the relevant current and subsequent cases in the IDN ccTLD Fast Track process as well as to inform the proposed policy for the selection of the IDN ccTLD strings”*.

The Working Group charter was adopted by the ccNSO Council on 11 September 2015. The call for volunteers for the Working Group was sent out on the ccNSO list on 30 September 2015 with 9 October as deadline to respond. The mailing list was [ccnso-epsrp@icann.org](mailto:ccnso-epsrp@icann.org)

The Working Group was finally formed on 23 November 2015. It comprised four ccTLD representatives, two members of the GAC as observer/participant and one ICANN staff member as expert as foreseen in the Working Group charter.

Following very active email exchanges, calls and a face-to-face meeting, the Working Group decided to limit its work to the review of the original EPSRP guidelines to address the issues reported in the ICANN Board resolution. At the same time, considering the complexity of the matter, the need to ensure the security, stability and interoperability of the DNS throughout the TLD landscape, and last but not least the ultimate goal of promoting linguistic diversity in the cyberspace, the Working Group deemed appropriate to consolidate all the side thoughts and considerations into a recommendation paper that aims to support the RFC 6912 and to enable ICANN to run a consistency exercise against the concept of “confusing similarity” in the TLD environment.

The Final Report of the ccNSO EPSRP Working Group was sent to the ccNSO Council Chair on 6 October 2016.