



AT-LARGE ADVISORY COMMITTEE

EN

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ORIGINAL: English

DATE: 18 January 2010

STATUS: Final

Statement of the Committee

Related to the Final Report on Three-Character Requirement and Variant Management

Introduction
By the Staff of ICANN

The ALAC Statement on the Final Report on Three-Character Requirement and Variant Management was originally drafted by James Seng, Member of the At-Large Advisory Committee and Chair of the At-Large working group on IDN Policy. The original text was made available for At-Large community feedback on December 19th 2009.

The present version of this document (revision 1) was prepared by James Seng on January 10th, 2010 and incorporates comments received from the At-Large community on the original version. You may [click here](#) to compare the two versions.

The Chair of the ALAC asked the Staff to start a five-day ALAC vote on the document on January 11th, 2010 and to send the staff person responsible for the public consultation on the corresponding document a note to inform him that the document was undergoing the ALAC ratification process.

The online vote on this Statement ended on January 16th. The result of said vote being that the ALAC endorsed the Statement with a 11-0 vote. You may review the result of that vote online under:
<https://www.bigpulse.com/pollresults?code=c9ugF5EHNCvswhTQcxIx>

A copy of this Statement was sent to the ICANN Board of Directors on January 18th 2010.

(End of Introduction)

The original version of this document is the English text available at www.atlarge.icann.org/correspondence. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail.

ALAC Statement on the Final Report on Three-Character Requirement and Variant Management

ALAC is please to see progress made on the three character requirement and variant management for IDN TLD implementation. We appreciate the hard work by IDN TLD Implementation working team.

ALAC has reviewed the Final Report on Three-Character Requirement and Variant Management and the followings are our comments:

General Positions

1. ALAC believes that every culture and language is unique. Attempts to uniformly apply rules and restrictions across cultures and languages would inevitably lead to maladministration. Therefore, ICANN should be flexible in adopting different policy for different culture and language in its implementation of IDN policy.
2. ALAC recommend that ICANN removes its three-character requirement for IDN TLDs. The historical context whereby such restrictions for ASCII/English is no longer relevant to today implementation of IDN TLDs.
3. ALAC agree that ICANN should have variant management at the top level. In some cultures, certain strings are considered the "same" by the community and that ICANN rules should be consistent with what is considered norm within that culture.

Three-Character Restriction in gTLD Strings

4. ALAC noted the recommendation of the working team and encourage ICANN undertakes the study for potential impact of relaxing the restriction on the allocation of one-character IDN TLD labels as soon as possible, hopefully before finalization of the Draft Application Guidebook.

Variant Management

5. ALAC recommend that applicants who requested Type 1 or 2 Desired Variant Labels must treat Desired Variant Labels as equivalent to Base IDN TLD Label for all intend and purposes. Applicants may not charge additional fees to registrants and registrars for Desired Variant Labels TLD.
6. ALAC support the recommendation that DNAME to be used as the preferred mechanism for variant delegation but ALAC believes ICANN should retain the flexible to delegate Desired Variant Labels using NS should it choose to.

James Seng
ALAC, IDN Liaison