IDN ccTLD Fast Track Review (FINAL DRAFT)

APRALO welcomes the opportunity to provide comments on the review of the IDN ccTLD Fast Track process.

First of all, APRALO believes that the experience from the implementation of the IDN ccTLD Fast Track should be used as input for the introduction of IDN gTLDs, especially in the following areas:

1. The applications received for IDN ccTLDs demonstrate a strong pent-up demand from the Asia Pacific region for the introduction of IDN TLDs. A majority of the IDN ccTLDs are from the Asia Pacific region. The implementation of IDN gTLDs should take into consideration the perspectives and experience from the Asia Pacific region, where knowledge and expertise resides.

2. The implementation of IDN Variant TLDs at the root for Chinese IDN TLDs has proven to be successful. The same implementation, more specifically, concurrent NS delegations for the Primary and Preferred IDN Variant TLD strings, is the appropriate technical implementation for Chinese IDN TLDs, compliant with CDNC (Chinese Domain Names Consortium) recommendations, and is the current best approach for Chinese IDNs to maintain the security and stability of the Internet.

3. The issue of visual similarity of IDN TLDs is not a good measurement of confusing similarity. The new gTLD process should avoid the repeating of such mistake. More specifically, an IDN TLD application should not be rejected simply because of visual similarity, other aspects should be taken into consideration. Currently, the new gTLD process does not have any recourse for such situations.

4. The introduction of IDN ccTLDs have increased the end-user expectation for IDN gTLDs. ICANN should prioritize the introduction of IDN gTLDs. The benefit for introducing IDN gTLDs significantly overweighs the cost for which. Such cost-benefit condition is clearly dissimilar with addition of more new ASCII gTLDs.

Furthermore, regarding the IDN ccTLD Fast Track specifically, we would like to express our comments as follows:

A. Future applications for Chinese IDN TLDs with IDN Variants should follow a similar approach in terms of technical implementation at the root.

B. Where the operator (i.e. sponsor) for an IDN ccTLD is the same as that for a corresponding ASCII ccTLD, the IANA WHOIS should reflect such situation more appropriately.

C. The transparency of the process of evaluating IDN ccTLD applications should be enhanced. The applied for strings should be announced earlier in the process and string evaluation reports should be made public.