

The ICANN GNSO “Business Constituency”



ICANN Business Constituency (BC) Comment on

[Draft Guidelines for Advancing UA Adoption](#)

13-APR-2026

Background:

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter. The mission of the BC is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. Promotes end-user confidence because it is a safe place to conduct business;
2. Is competitive in the supply of registry and registrar and related services; and
3. Is technically stable, secure and reliable.

General Comment

The Business Constituency (BC) appreciates the opportunity to comment on the Universal Acceptance Expert Working Group’s (UA EWG’s) *draft Guidelines for Advancing Universal Acceptance (UA) Adoption*.

The BC has demonstrated consistent commitment to supporting Internationalized Domain Names (IDNs) and UA initiatives since the 2012 round of new gTLDs, through the UASG’s 10-year-long, community-led effort, and the formation of the UA Expert Working Group. We support initiatives that expand the availability of domain names and email addresses in a variety of scripts and languages.

The BC recognizes the importance of establishing a strategic framework to accelerate UA adoption. We consider the guidelines put forward by the UA EWG a positive step forward towards ensuring an increased support for Internationalized Domain Names among Internet enabled applications and infrastructure. However, we believe the guidelines can be further strengthened in the following areas.

I. The “Limited Stakeholder Engagement” Approach

The BC recognizes the rationale for narrowing the scope of the UA agenda following the 10 years of UASG activity and acknowledges that one approach may involve working with a select group of stakeholders. However, we are concerned that such a strategy may limit engagement with the broader UA community and may inadvertently limit the benefits of over a decade of collaborative efforts between ICANN Org and the UA community.. We believe the “universal” nature of UA work should continue to be preserved, even if at a limited scale, in the following areas:

I.1 Developing and restructuring the UA documentations

We believe the work of building a structured technical documentation for “UA Readiness” is most important when it comes to UA adoption. We have seen that the UASG.tech website has been archived as of November 2025 and an alternative website has not been suggested to this day. We also see that a lot of the documentation is currently found dispersed on the UASG.tech website and GitHub. We therefore suggest that a centralized, comprehensive, and well-structured documentation platform be developed and continuously maintained with community input. In this regard, we have reservations regarding General Guideline 2: ‘Create a Dedicated Webpage for Each Stakeholder,’ and encourage its reconsideration. We believe the UA agenda and its mechanisms are inherently “universal” and should be presented within a unified framework.

I.2 Working with the open-source community primarily to build documentations

We encourage the UA EWG proposed strategy of working with the open-source community, and we believe it’s most important to collaborate with the open-source community especially while building UA documentations. We suggest the UA EWG engages more with the open-source developer community in getting the UA mechanisms well tested and solidified on different platforms. The documentations should be the end result of sufficient back-and-forth with the appropriate developer community.

I.3 Focus on Revenue-driven operations

We recognize that commercial incentives are a primary driver for the adoption of internet-enabled applications. In this regard, we recommend that Charter Question 1 – Guideline 3 (“Showcase Economic and Business Value”) and its subsections (a–d), currently directed at large technology companies, be expanded to apply to businesses of all sizes.

We further suggest that demonstrating the economic value of UA-ready IDNs, particularly in terms of access to new user segments and market expansion, should be central to the UA adoption strategy.

I.4 Security and abuse mitigation considerations

We believe another driving force especially for large Internet enabled applications is security. Today, services such as instant messaging apps, mobile money platforms, and social media platforms operate in environments where trust, security, and user confidence are critical to sustained adoption. In this context, UA-ready IDNs and email addresses can enhance usability, recognition, and trust, particularly for end-users in non-English-speaking communities. We therefore encourage the UA EWG to explicitly incorporate security and abuse mitigation considerations into its guidelines, highlighting the role of UA in strengthening user trust and reporting mechanisms.

I.5 Publicizing UA documentations and the overall UA agenda through the proper channel

Publicity is a key driver for community engagement and helps to gain early traction among tech organizations and end users. Instead of going at the UA agenda stakeholder by stakeholder, it may be more effective to engage niche communities and promote the UA agenda, documentations and success stories targeting an organic community engagement. We recommend leveraging social media, developer forums, industry events and public relation channels- including press releases, technical blogs and international media—to increase awareness and adoption of UA initiatives.

I.6 Laying out a proper support system

Support systems are another way to broaden community engagement and solidify the UA mechanisms. Support systems encourage feedback and ensure compliance is met among UA implementers. We suggest support mechanisms that go along with the documentations, including community-driven mechanisms like on-line discussion forums. Such forums assist in acquiring rapid solutions to specific issues and allow volunteers to participate largely to solve community issues.

I.7 Collaborate with Universities for Research and Development

We encourage continued collaboration with universities, particularly within non-English-speaking and diverse script communities, to advance research and development in UA. Given the unique challenges faced by different script communities, targeted research efforts are essential.

We recommend that the UA EWG establish a dedicated platform for UA research initiatives and consider providing financial and technical support for selected research projects in collaboration with ICANN.

I.8 Develop and enhance Standardization, Accreditation and Certification work

We support all the standardization efforts outlined under Charter Question 3 (Guidelines 13, 14, and 15). In addition, we recommend UA EWG to develop and enhance its own standardization, accreditation and certification programs. We believe such programs help to showcase success stories, maintain overall quality and motivate organizations to become UA ready. Such standardization and accreditation work not only create consistency in UA adoption, but also enhance efficiency by establishing recognition mechanisms for best efforts.

II. Select the right stakeholders to work with

As noted earlier, while a limited stakeholder engagement approach may provide focus, it also carries the risk of excluding critical voices within the UA ecosystem. Should this approach be adopted, it is essential to carefully define and select the appropriate stakeholders.

II.1 What is the threshold for big-tech organizations?

We recommend that UA EWG establish a clear criteria threshold for defining “big-tech” organizations, which may include metrics such as revenue, user base, geographic reach, or workforce size.

II.2 Representation of end-user community

We note that UA adoption is particularly relevant to the Global South, especially among non-English-speaking populations. We believe that startups, local developers, and small-to-medium enterprises are often closer to end-users and therefore play a more critical role in advancing UA adoption than large technology companies alone.

II.3 Inclusion of universities and open source communities

We support the inclusion of universities, particularly in non-English-speaking communities to advance UA research and development. Different script communities face unique and diverse challenges, which require targeted research efforts to address effectively.

We recommend that selected research initiatives be incentivized and sponsored by ICANN, both financially and technically.

Additionally, we call for the UA EWG to collaborate closely with the open-source community, which offers significant potential for self-driven innovation and scalable development, contributing meaningfully to the focused advancement of the UA agenda.

Conclusion

The Business Constituency (BC) appreciates the efforts of the UA Expert Working Group in advancing a more structured approach to Universal Acceptance. While the proposed guidelines represent a meaningful step forward, we believe that preserving the inclusive and “universal” nature of the UA agenda remains essential to achieving long-term success.

In particular, continued engagement with the broader community, alongside targeted collaboration with key stakeholders, will be critical to sustaining momentum and ensuring practical implementation. We emphasize the importance of clear documentation, strong business and security value propositions, and inclusive participation from universities, open-source communities, and emerging market actors.

The BC remains committed to supporting initiatives that drive adoption, enhance accessibility, and unlock the full economic and social value of a truly multilingual Internet. We look forward to continued collaboration with the UA EWG and the wider ICANN community in refining and advancing these efforts.