

ALAC Updates ----OCT/NOV 2020

Policy development activities

Statements approved by the ALAC

[IANA Naming Function Review \(IFR\) Initial Report](#)

The ALAC appreciates the opportunity to comment on the IANA Naming Function Review (IFR) Initial Report.

We encourage the ICANN Board to fulfill these recommendations as indicated in the report.

The ALAC also congratulates the IANA Naming Function Review Team for the methodology used in the elaboration of the review.

[DRAFT PTI and IANA FY22 Operating Plan and Budgets](#)

The ALAC appreciates the opportunity to comment on the DRAFT PTI and IANA FY22 Operating Plan and Budgets.

The budget - especially the operating plans - are an improvement on both PTI and IANA functions, as well as a transparent initiative to show the community “Operational Improvements Activities and System Enhancements” in advance.

Although there is a 30% increase in the budget from the last real results (FY20), the ALAC is glad to see that ICANN org is dedicating more resources to its core function.

[Recommendations for Early Warning for Root Zone Scaling](#)

The At-Large Advisory Committee (ALAC) appreciates the opportunity to submit this statement. We agree with the recommendations in the document as it is the right way to go given the challenges of associating measurements with scaling.

The ALAC would like to reiterate the following:

1. Early warning signs from the anti-abuse communities should be taken seriously.
2. Proper consultation/feedback channel or mechanism should be put in place between ICANN and the various stakeholders should there be any future RSS scaling concerns.

3. In the event that any ICANN process is severely impacted as a result of the proposed scaling, there should be a mechanism in place to pause the process.

[Proposed Amendment 1 to the .JOBS Registry Agreement](#)

At-Large is happy to have this opportunity to comment on proposed modifications to the .JOBS registry agreement. We are also grateful for a brief extension. The lengthy preparations and duration of the virtual AGM did take a lot of energy which we are still recouping.

The ALAC hereby registers concerns about the requested amendments to the .JOBS Registry Agreement with Employ Media which would remove the non-profit Society for Human Resource Management (SHRM) as sponsor and make Employ Media the sponsor of the .JOBS TLD in the absence of any clear rationale. Given that .JOBS is a legacy sponsored TLD, which has functioned as a community TLD, we do not feel that removing SHRM would serve the public interest. Although the proposed amendment proposes to preserve the HR Council, we wonder who would provide the oversight on the proposed commitment of Employ Media to ensure that this Council "functions independently to serve the needs and act in the interest of the .JOBS TLD community" -- currently a responsibility of SHRM, an entity that would appear much better suited to hold such responsibility. The proposed changes also reduce restrictions on registrant eligibility, which changes the essential nature of this sponsored TLD. Finally, it appears that the HR Council, which was once a policy development body and a voice of the community, has been reduced to an advisory role, which may turn out to be largely ceremonial.

We see that this proposal is a result of a bilateral agreement between Employ Media and ICANN.org. In this situation, ICANN needs to be the guardian of the interests of other stakeholders, not least the billions of end-users. We would like to point out that the end-user community places a very high value on the role of non-profits as stewards of TLDs, as was evident in the recent controversy over a proposed sale of PIR. In this proposal, the non-profit organization is removed as sponsor without any additional checks and balances on the new sponsor/registrar. We do not see how ICANN.org proposes to ensure that this change will "not result in a departure from or a drastic change to the TLD Sponsor's role, obligations, and commitments to the sponsored TLD Community or negative impact to the sponsored TLD Community" as stated in the proposed amendment. Instead, it appears that Employ Media is largely left to police itself, particularly since ICANN has agreed not to pursue certain types of claims against Employ Media.

ALAC believes that it would be in the best interests of end-users to maintain more robust oversight provision on behalf of the .jobs community, and ultimately the end-user community. Failing that, ICANN must exercise active oversight and compliance monitoring to ensure that this TLD maintains what is left of its governance structure as more than window dressing

Reference Label Generation Rulesets (LGRs) for the Second Level.

The ALAC has four areas of concern with regards to Reference Label Generation Rulesets (LGRs) for the Second Level:

1. First, the document says:

Where variants are included, their selection is informed by existing registry practice, as well as by the work performed at ICANN on the script LGRs for the Root Zone. Any cross-repertoire (or cross script) variants identified in the Root Zone have been retained here for use in zones that support reference LGRs for more than one script of language.

The ALAC believes that the particular registries whose practices were used should be specified. Also, links should be provided to the documentation of the “existing practices” used.

2. Second, the document starts from the work on LGRs for the Root Zone. But for several scripts, the repertoire allowed for the Root Zone is only a subset of the repertoire for the script included in the MSR for use in SLDs. This means that those missing code points were not considered for possible variants by the script Generation Panels. The ALAC believes that all those code points need to be evaluated as well.

3. Third, the criteria used by the Generation Panels are extremely narrow. The rationale for this is that additional cases would be evaluated manually by a Similarity Review Panel. But no such panel is envisioned for SLDs (and, realistically, such manual review is probably not possible for SLDs). Therefore, the ALAC believes that the definition of variants for SLDs needs to be substantially expanded. Otherwise, the level of potential confusion, and DNS Abuse, is simply too large.

4. Fourth, the document says that:

gTLD registry operators may consult these reference LGRs while they design their IDN tables to promote consistency.

Under the standard usage for RFCs, “may” merely gives permission to do something. However, the ALAC believes that as something that is critical for security and the avoidance of DNS Abuse, blocking variant names should not be optional. Accordingly, the ALAC requests revising the text to read:

gTLD registry operators will incorporate these reference LGRs when they design their IDN variant tables.