

Policy for the (De-)Selection of IDNccTLD Strings and Variants

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0 - Introduction

In March 2020, the ccNSO Council initiated the fourth ccNSO Policy Development Process (ccPDP4) to develop a policy for the (de-) selection, delegation, transfer, revocation & retirement of IDNccTLDs. The task was to address the issues identified by the ccNSO Preliminary Review Team in the 2013 proposed policy for the selection of IDNccTLD strings, for example the lack of definition of variant and variant management and the deselection of IDNccTLD strings, i.e., the retirement of IDNccTLDs.

In July 2022, the ccNSO Council additionally tasked the ccPDP4 Working Group to look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii) (exclusion of the Independent Review Process and Reconsideration), and, if needed, make recommendations to that effect. In addition, ccPDP4 was tasked to recommend whether the Review Mechanism should apply, which was developed in parallel with the ccPDP4 effort.

The proposals do not intend to amend nor change current policies – for example, RFC 1591 as interpreted by the Framework of Interpretation - for the delegation, transfer, revocation, and retirement of ccTLDs. Instead, the goal is that the ccPDP4 recommendations build on these policies.

In March 2024, the ccNSO Council expressed its support for the proposed policy as the Council Recommendation. The Council Recommendation was adopted by 97 % of all the votes received (97 out of 174 Emissaries voted) by May 2024. The Board report was submitted in June 2024.

The Board adopted the policy in [insert date]

The policy as included in this document is extracted form the Board Report.

Section 1 - Policy Objective, Applicability and Principles

This policy's objective is to provide a framework to ICANN and the broader community for the selection of IDNccTLD strings and variants thereof, the delegation, transfer, revocation, and retirement of the selected IDNccTLD string and its variants, and the use of the review mechanism pertaining to decisions concerning the delegation, transfer, revocation, and retirement of IDNccTLDs.

This policy does not amend nor change current policies for the delegation, transfer, revocation, and retirement of ccTLDs; rather, it builds on these policies. However, it is recognized that due to the nature of an IDN TLD and its related variants, additional, specific provisions are provided that are required for IDNccTLDs only; for example, an IDNccTLD string and its Delegatable variants must be delegated to the same entity, i.e., the same (IDN)ccTLD manager.

To guide this policy's development, implementation, and future interpretation, overarching principles or design criteria were defined, considering the 2013 draft of the IDNccTLD policy, the experiences of the IDN Fast Track Process, and subsequent discussions. The principles are:

I. Association of the (IDN) country code Top Level Domain with a territory. For purposes of this policy “Territory” or “Territories” are defined as a country, a subdivision, or other area of particular geopolitical interest listed in Section 3 of the ‘International Standard ISO 3166, Codes for the representation of names of countries and their subdivisions – Part 1: Country Codes’ [ISO 3166-1:2020] or, in some exceptional cases, e.g. grandfathered-in delegations, a country, a subdivision, or other area of particular geopolitical interest listed for an exceptionally reserved ISO 3166-1 code element.

Under the current policy for delegating (ASCII) ccTLDs¹, only the country codes associated with Territories are eligible for delegation as ccTLDs. Therefore, only IDNccTLD strings related to a Territory qualify for delegation as ccTLDs.

II. (ASCII) ccTLD and IDNccTLDs are all country code Top Level Domains. (ASCII) ccTLD and IDNccTLDs are all country code Top Level Domains and, as such, are associated with a Territory. While additional, specific provisions may be required for IDNccTLDs due to their nature (for example, criteria for selecting an IDNccTLD string), all country code Top Level Domains should be treated similarly.

¹ RFC 1591 as interpreted by the [Framework of Interpretation](#)

III. Preserve security, stability, and interoperability of the DNS. To the extent different and/or additional rules are implemented for IDNccTLDs, these rules should:

- Preserve and ensure the security and stability of the DNS;
- Ensure adherence with the RFC 5890, RFC 5891, RFC 5892, RFC 5893 and their successors
- Consider and be guided by the Principles for Unicode Code Point Inclusion in Labels in the DNS Root (RFC 6912).

IV. Ongoing Process. Requests for the validation and delegation of IDNccTLDs should be ongoing, and requests can be submitted at any time, which also applies to variants of IDNccTLD strings. Once all the criteria are met, the delegation of a ccTLD (both ASCII and/or IDN and/or variants of the IDNccTLD that meet the requirements) can be requested at any time.

V. Criteria determine the number of IDNccTLDs. The criteria for selecting the IDNccTLD string should determine the number of eligible IDNccTLDs per Territory, not an arbitrarily set number.

2. Overview of the applicable policies

2.1 Selection, delegation, transfer, revocation, and retirement of IDNccTLD strings

Under the proposed policy, a two-stage process is recommended for the selection of an IDNccTLD string:

- Step 1: String selection stage in Territory
- Step 2: Validation of IDNccTLD string

The policy recommendations concerning the process, procedures, and required documentation, if any, for selecting IDNccTLD strings and their variant(s) will be described below at a general level and a more detailed level for both stages in sections 3 - 10.

As stated above, this policy does not amend nor change current policies for the delegation, transfer, revocation, and retirement of ccTLDs; rather, it builds on these policies. However, it is recognized that due to the nature of an IDN TLD and its related variants, additional, specific provisions are provided that are required for IDNccTLDs only; for example, an IDN ccTLD string and its Delegatable variants must be delegated to the same entity, i.e., the same (IDN)ccTLD manager. Therefore, once the IDNccTLD a selected IDNccTLD string and/or its variant(s) are deemed valid and meet the criteria, delegation can be requested following the regular policy and IANA procedures for delegating ccTLDs.

2.1.1 Stage 1: String Selection in Territory

General Description

The string selection stage is a local matter in the Territory and should ideally involve all relevant local actors in the Territory. The actors in Territory must:

1. Select the IDNccTLD string. Identify the language and script and select the IDNccTLD string. The chosen string must meet the meaningfulness and technical requirements and should not be confusingly similar to what is defined under this policy.
2. Seek endorsement /support by the relevant stakeholders in the Territory for the selected string.
3. Select the intended IDNccTLD string requester before submitting an IDNccTLD string for validation. In cases where the string requester has yet to be selected, the relevant public authority of the Territory may act as nominee for the to-be-selected string requester.

As advised in Part B, the requester is also expected to prepare the IDN table for the language /script combination in which the IDNccTLD string is expressed based on the Label Generation Rule for the selected language/script combination and submit this table with IANA, although this is not mandatory.

As part of the in-territory step, the following documentation must be prepared:

- i. Documentation of the meaningfulness of the selected IDNccTLD string and/or the requested variant strings is/are according to requirements described in section 3.2.5
- ii. The documentation of the selected string and/or the requested variants is/are in the Designated Language according to the requirements described in section 3.2.6.
- iii. Documentation of required endorsement/support for selected string or requested variants of the chosen string by Significantly Interested Parties, according to requirements described in section 4.2

2.1.2 Stage 2: Validation of IDNccTLD string

General description

The String Validation stage is a set of procedures to meet all criteria and requirements regarding the selected IDNccTLD string. Typically, this would involve:

- The IDNccTLD string requester. The IDNccTLD requester initiates this process stage by submitting a request for adoption and associated documentation.
- ICANN staff. ICANN staff will process the submission and coordinate between the different actors involved.
- External, Independent Panels (Technical, Similarity & Risk Mitigation Appraisal) to validate the selected string and its variant(s).

The activities during this stage would typically involve:

- Submission of selected string and its requested variants and related documentation.
- Validation of selected IDNccTLD string and/or the requested variants:
 - a. ICANN staff validation of request. This includes:
 - i. Completeness of request
 - ii. Completeness and adequacy of Meaningfulness and Designated Language documentation
 - iii. Completeness and adequacy of support from relevant public authority
 - iv. Completeness and adequacy of support from other Significantly Interested Parties
 - b. Independent Validations
 - i. Technical Validation (Technical requirements and RZ-LGR)
 - ii. String Confusion Validation
- Publication of selected IDNccTLD string on ICANN website
- Completion of string Selection Process
- Change, withdrawal, or termination of the request.

2.2 Delegation, Transfer, Revocation and Retirement of IDNccTLD strings

2.2.1 Applicability of Other Policies

All ccTLD policies regarding the delegation, transfer, revocation, and retirement of ccTLDs apply to the delegation, transfer, revocation, and retirement of (variant) IDNccTLDs. However, if foreseen under this policy, specific requirements under such a policy may vary for the selected IDNccTLD string and its variants. This is further detailed in sections 2.2.2 below and sections 11 and 12.

For the avoidance of doubt, if a selected IDNccTLD string is transferred, revoked, or retired, all Delegatable Variants which have been delegated shall follow the transfer, revocation, or retirement of the selected IDNccTLD string, unless otherwise proposed (see section 13)

2.2.2 Specific requirement following the retirement of the selected IDNccTLD string

Following the conclusion of its retirement process, a selected IDNccTLD string is removed from the DNS, and the selected IDNccTLD string shall not be available for re-assignment or selection for at least ten years following the removal. During this period of 10 years, the ccNSO is expected to launch a ccNSO Policy Development Process on re-using IDNccTLD strings and their variants. Factors to consider in such a ccPDP on possible re-use are:

- Use of the IDNccTLD before retirement
- Cause of retirement
- Possible re-use of the IDNccTLD string
- Mechanism to allow re-use

2.2.3 Review Mechanism for decisions under the proposed policy

As under the proposed ccPDP3 Review Mechanism policy – if a ccTLD Manager is directly impacted by the IANA Function Operator (IFO) - it is proposed that the review mechanism should be available to IDNccTLD Managers.

Some proposals under this proposed policy may result in ICANN's decision to deselect an IDNccTLD string and/or its variants and, hence, to retire an IDNccTLD or its variants. According to the ccTLD retirement policy (as adopted in September 2022), the retirement of an (IDN)ccTLD requires the IFO to serve a Notice of Retirement to the (IDN)ccTLD Manager. This Notice formally starts the (clock of the) ccTLD retirement process.

In addition, and specifically for the IDNccTLD Manager, the proposed review mechanism should be available if the manager is served a Notice of Retirement following the deselection of an IDNccTLD string and/or its variants strings resulting from:

- Change of Name of the Territory, Change of designated language, Change of script or writing system (See section 12)
- Impact IDNccTLD string becomes contentious within the Territory (See section 12 below).

Section 3 - Selection of IDNccTLD Strings

3. Criteria for the selection of IDNccTLD strings

3.1 Minimal Number of non-ASCII characters

An IDN country code Top Level Domain must contain at least one (1) non-ASCII character (i.e., a character not included in the ISO/IEC 646 Basic Character Set). To illustrate this criterion, *españa* would qualify under this specific requirement and *italia* would not. Note that *españa* contains at least one (1) non-ASCII character (i.e., a character not included in ISO/IEC 646 Basic Character Set). For more formal definitions of these terms, see RFC 5890.

Further, the selected U-label of the requested string, whether the selected IDNccTLD string or a requested variant of the specified string, must contain at least two characters². This requirement should be reviewed as part of the policy's first review (see section 14 below).

² The term character is used to denote Base Character as defined in [Unicode](#). This would address cases in many scripts for IDNs based on RZ-LGR (Arabic, Chinese, alphabetic scripts like Latin and Cyrillic, etc.) where two characters may represent a single base character, e.g.: U+025B (ε) U+0308 (̈) = ̈ε .

For scripts used in South Asia and Southeast Asia, this would mean that the string will contain at least two consonants/independent vowels (here consonant+dependent-vowel combination will not be sufficient; some complications arise due to conjunct consonants):”

3.2 Meaningfulness Criteria and related processes and procedures

3.2.1 The IDNccTLD string must be a Meaningful Representation of the name of a Territory. The principle underlying the representation of Territories in two-letter (ASCII) code elements is the visual association between the names of Territories (in English or French, or sometimes in another language) and their corresponding code elements. The principle of association between the country code string and the name of a Territory should be maintained concerning IDNccTLD strings. A selected IDNccTLD string must be a meaningful representation of the name of the Territory. A country code string is considered to be a Meaningful Representation if it is:

- a) The name of the Territory³; or
- b) Part of the name of the Territory that denotes the Territory⁴ or
- c) A short-form designation for the name of the Territory, recognizably denoting the name⁵.

3.2.2 The selected IDNccTLD string should represent the territory's name in its Designated Language. For this purpose, a Designated Language is defined as a language with a legal status in the Territory or as a language of administration⁶.

A language is defined as a Designated Language if one or more of the following requirements is/are met:

- a) The language is listed as the “Official Language” for the relevant Territory as an ISO 639 language in Part Three of the “Technical Reference Manual for the Standardization of Geographical Names,” United Nations Group of Experts on Geographical Names (the [UNGEGN Manual](#)).
- b) The language is listed as administrative for the relevant Territory as defined in section 3.7 of ISO 3166-1 standard [2020].
- c) The relevant public authority in the Territory confirms that the language is used in official communications of the appropriate public authority and serves as a language of administration.

The procedures and documentation sections include specific requirements for documenting designated languages (See section 3.2.7).

³ A ASCII example: “Kingdom of the Netherlands”

⁴ An example related to example in note 16: “Netherlands”

⁵ An example related to examples in footnote 16 and 17: “NL”

⁶ The definition of **Designated Language** is based on: “[Glossary of Terms for the Standardization of Geographical Names](#)”, United Nations Group of Experts on Geographic Names, United Nations, New York, 2002 . Note that in the Glossary the term “Official Language” is used. This term is not used as experience has shown that depending on the specific Territory “Official Language” has a specific connotation, which sometimes creates confusion with the term “Official Language” as defined in the Glossary.

3.2.3 Only one (1) IDNccTLD string per Designated Language. If there is more than one Designated Language in the Territory, one (1) unique IDNccTLD for each Designated Language may be selected, provided the Meaningful Representation in one Designated Language cannot be confused with an existing IDNccTLD string for that Territory.

For purposes of this policy, the restriction of one (1) IDNccTLD string per Designated Language does not apply to selecting and delegating variants of the selected IDNccTLD string. However, this exception applies only to the extent the other requirements under this policy for the request, and the delegation of variants of the selected IDNccTLD string are met.

Where a language is expressed in more than one script in a Territory, having one string per script is permissible, although the multiple strings are in the same Designated Language.

3.2.4 If the selected string is not the long or short form of the name of a Territory, then evidence of meaningfulness is required. If the selected IDNccTLD string is the long or short form of the name of the relevant Territory in the Designated Language and is listed in the UNGEGN Technical Reference Manual for the Standardization of Geographic Names, Part Three column 3 or 4 version 2007⁷, or a later version of that list, it is a Meaningful Representation.

If the Meaningful Representation of the selected string is listed outside the UNGEGN Technical Reference Manual for the Standardization of Geographic Names, Part Three column 3 or 4 version 2007, or a later version of that list, meaningfulness must be adequately documented. Adequate documentation must be provided if one of the following cases applies:

1. The selected IDNccTLD string is not the long or short form name of the Territory as included in the UNGEGN Manual in the Designated Language,
or
2. The selected IDNccTLD string is an acronym of the name of the Territory in the Designated Language
or
3. The selected IDNccTLD string is the name of a Territory that does not appear in the UNGEGN Manual,
or

⁷https://unstats.un.org/unsd/ungegn/pubs/documents/UNGEGN%20tech%20ref%20manual_m87_combined.pdf. Note that the UNGEGN Technical Reference Manual only contains the names of 192 Countries, which is a sub-set of all the Territories listed under the ISO 3166 standard.

4. The selected IDNccTLD string is in a Designated Language not included in the UNGEGN Manual.

If such documentation is required, the documentation needs to establish that clearly:

- The meaning of the selected string in the Designated Language and English and
- That the chosen string meets the meaningfulness criteria.

The procedures and documentation recommendations include specific requirements regarding documentation to demonstrate Meaningful Representation (see sections 3.2.5 and 3.2.7 below).

3.2.5 Documentation of the meaningfulness of the selected IDNccTLD string

The selected IDNccTLD string(s) must be a Meaningful Representation of the name of the corresponding Territory. A string is deemed to be meaningful if it is in the Designated Language of the Territory and if it is:

1. The name of the Territory; or
2. A part of the name of the Territory denoting the Territory; or
3. A short-form designation for the name of the Territory that is recognizable and denotes the Territory in the selected language.

The meaningfulness requirement is verified as follows:

1. If the selected string is listed in the UNGEGN Manual, then the string fulfills the meaningfulness requirement.
2. If the selected string is not listed in the UNGEGN Manual, the requester must substantiate the meaning by providing documentation from an internationally recognized expert or organization.

ICANN should recognize and accept documentation from one of the following experts or organizations as internationally recognized:

- National Naming Authority – A government-recognized National Geographic Naming Authority or other organization performing the same function for the Territory for which the selected string request is presented. The United Nations Group of Experts on Geographical Names (UNGEGN) maintains such a list of organizations at: <https://unstats.un.org/unsd/geoinfo/ungegn/publications.html> [unstats.un.org]
- National Linguistic Authority—A government-recognized National Linguistic Authority or other organization performing the same function for the Territory for which the selected string request is presented.

In exceptional circumstances where there is no access to a National Naming Authority or a National Linguistic Authority for the Territory, assistance may be requested from

ICANN to identify and seek reference to an expert or organization to provide the required documentation. This documentation will be considered acceptable and sufficient to determine whether a string is a Meaningful Representation of a Territory name.

ICANN should include a procedure, including a timeframe, in the implementation plan to identify expertise referred to or agreed to as set out in the final paragraph of section 3.2.5 above.

3.2.6 Documentation Designated Language. The requirement for allowable languages and scripts to be used for the selected IDNccTLD string is that the language must be a Designated Language in the Territory as defined in the section (see above). The language requirement is considered verified if one of the following conditions is met:

1. If the language is listed for the relevant Territory as an ISO 639 language in Part Three of the *Technical Reference Manual for the Standardization of Geographical Names, United Nations Group of Experts on Geographical Names* ([“UNGEGN Manual”](#)):
or
2. If the language is listed as an administrative language for the relevant Territory in ISO 3166-1,
or
3. If the relevant public authority of the Territory confirms that the language is used or serves as follows (either by letter or link to the relevant government constitution or other online documentation from an official government website):
 - a. Used in official communications by the relevant public authority;
or
 - b. Serves as a language of administration.

Further, the documentation must reference the script or scripts in which the Designated Language is expressed and must be listed in the script charts of the latest version of UNICODE.

ICANN is advised to include an example of the documentation that the selected language(s) is considered designated in the Territory in the implementation plan. However, this is regarded as a matter of implementation.

4. Required Support for the selected IDNccTLD string

4.1 The selected IDNccTLD string must be non-contentious within the Territory. The selected IDNccTLD string must be non-contentious within the Territory. The non-contentiousness is evidenced by a statement of support/endorsement/non-objection by the significantly interested parties⁸ in the Territory.

ICANN should include an example of the documentation required to demonstrate the support or non-objection for the selected string(s) in the implementation plan.

If, during the process of selecting an IDNccTLD string, concurrent requests for the same or more IDNccTLD strings in the same Designated Language for the same Territory are submitted, they shall be considered competing requests and are therefore deemed to be contentious within the Territory. Before any further steps are taken in the selection process, this issue must be resolved in the Territory before any requests are made. If a concurrent request for an IDNccTLD string is received after the validation of the first requested IDNccTLD string has been completed, and the requested IDNccTLD is published (see section 9 below), this second request shall be considered erroneous, and section Change, withdrawal, or termination of the request section 10 below applies.

4.2 Endorsement/support/non-objection for selected string by Significantly Interested Parties and others

4.2.1 Significantly Interested Parties. Significantly Interested Parties include but are not limited to:

1. the government or territorial authority for the Territory associated with the IDNccTLD string and
2. any other individuals, organizations, companies, associations, educational institutions, or others in the Territory that have a direct, material, substantial, legitimate, and demonstrable interest.

⁸ The concept Significantly Interested Parties is derived from RFC 1591 and used as detailed in the Framework of Interpretation. Accordingly: The FOIWG interprets “Significantly Interested Parties” (section 3.4 of RFC1591) to include, but not be limited to: a) the government or territorial authority for the country or territory associated with the ccTLD and b) any other individuals, organizations, companies, associations, educational institutions, or others that have a direct, material, substantial, legitimate, and demonstrable interest in the operation of the ccTLD(s) including the incumbent manager. To be considered a Significantly Interested Party, any party other than the manager or the government or territorial authority for the country or territory associated with the ccTLD must demonstrate that it has a direct, material, and legitimate interest in the operation of the ccTLD(s). The FOIWG interprets the requirement for approval from Significantly Interested Parties (section 3.4 of RFC1591) to require applicants to provide documentation of support by stakeholders and for the IANA Operator to evaluate and document this input for delegations and transfers.

To be considered a Significantly Interested Party, any party other than the government or authority for the Territory associated with the selected IDNccTLD must demonstrate that it has a direct, material, legitimate and demonstrable interest in the operation of the proposed IDNccTLD(s).

4.2.2 Others - Requesters should be encouraged to provide documentation of the support of stakeholders for the selected string, including an opportunity for stakeholders to comment on the selection of the proposed string via a public process. “Stakeholders” is used here to encompass Significantly Interested Parties, “interested parties” and “other parties.”

4.2.3 Classification of input

For procedural purposes, the following cases should be distinguished:

- Request for the full or short name of the Territory (as defined in Section 3).
- Other cases where additional documentation is required.

In both cases, the relevant Government or public Authority must be involved, and its non-objection should be documented at a minimum.

Section 5 – Variants and Variants Management

5.1 Introduction

In the Variant Management section, the following two questions concerning (IDN)ccTLDs are addressed:

- How are variants of the selected IDNccTLD string defined?
- How should variants of the selected IDNccTLD string be managed?

Concerning the first question—the definition of TLD variables—the ICANN Board resolved on 11 Apr. 2013 to implement the Label Generation Rule (LGR) Procedure for the Root Zone (RZ). The RZ LGR is supported for the implementation of the IDNccTLD policy.

Concerning the second question, the management of the IDNccTLD variant, the results of the deliberations are included in this section of the document. The work to date is based on the following documents and background material:

The ICANN Board of Directors resolutions:

- Approved on 14 March 2019, IDN Variant TLD Recommendations and requested ccNSO and GNSO take into account the recommendations while developing their respective policies to define and manage the IDN variant TLDs for the current TLDs as well as for future TLD applications and communicate for a consistent solution.
- [Approved](#) on 26 January 2020 [Recommendations for the Technical Utilization of the Root Zone Label Generation Rules](#) and requested the ccNSO and GNSO Councils take into account the Recommendations while developing their respective policies to define and manage the IDN variant TLDs for current TLDs as well as for future TLD applications.

In addition, the IDN Variant TLD Recommendations were first reviewed to ensure a coordinated and consistent approach, as requested. The GNSO's view on these Recommendations was also considered, and the ccPDP4 working group was kept apprised about the progress of the GNSO EPDP in this area and on the latest work of SSAC in this area (SAC 120).

The recommendations on the Technical Utilization of RZ-LGR were also considered. Again, first, the recommendations as adopted were considered. In addition, the GNSO view on these recommendations, if any, was considered.

Recommendations and advice.

Issues about the IDN Tables, i.e., using variants at the second or lower level, were identified during the policy's development.

It was considered that addressing the issues about the use of variants at the second level would be needed to ensure the stability, security, and interoperability of the DNS. However, this would be outside the remit of a ccNSO policy. Therefore, the working group opted to include advice for ccTLD managers. This advice to ccTLD Managers is not part of the recommended policy and is subject to the [Internal Rules of the ccNSO](#) about advice to ccTLD Managers.

Part A of this section Report (sections 5.2 – 5.5 below) contains policy recommendations for managing variant IDNccTLDs. Part B (sections 1 and 2) contains advice to IDNccTLD managers.

5.2 IDNccTLD Variants

5.2.1 Variants. The set of variant labels of a given (IDN*) ccTLD string or label is defined by the RZ-LGR. It is calculated by the RZ-LGR using the selected ccTLD string as the primary label. This calculation also assigns one of two disposition values to each variant label (allocatable or blocked). Only the allocatable labels may be eligible for allocation or delegation as a top-level domain. See RFC 8228 for details.

Compliance with Root Zone Label Generation Rules (RZ-LGR, RZ-LGR-2, and any future RZ-LGR rules sets) shall be required for the generation of an IDNccTLD string and its variants, including the determination of whether the string is Blocked or Allocatable. IDN TLDs must comply with IDNA2008 (RFCs 5890-5895) or its successor(s).

5.2.2 Scripts integrated into RZ-LGR. For the scripts and writing systems which have been incorporated into the RZ-LGR, the RZ-LGR must be the only source for processing the following cases:

- Validate an applied-for TLD string and determine its variant string(s) with corresponding dispositions.
- Calculate variant strings and corresponding disposition values for each one of the already delegated TLD Strings.

5.2.3. Limitation of delegation of variants. Only Allocatable Variants of the selected IDNccTLD string that are Meaningful Representations of the name of the Territory in the

Designated⁹ Language are eligible to be delegated (hereafter: Delegatable Variant or Delegatable Variants)

These criteria shall be subject to the first review of the IDNccTLD string selection policy, as foreseen in Section 14, Review of policy for selecting IDNccTLD strings.¹⁰

5.2.4. Impact of possible amendment of RZ-LGR. It is expected that the RZ-LGR will be revised throughout its lifecycle because a new script LGR is being integrated or a revision of an existing script LGR is being integrated into the Root Zone LGR. There may be a case where the update in the Root Zone LGR does not support an existing IDNccTLD. In such a case, the delegated IDNccTLD(s), both the selected and delegatable variant(s), must be grandfathered.

5.3 Allocation of Variant Top Level Domain strings to the same entity. The set of allocatable variant strings that are generated from the selected IDNccTLD string by applying the RZ-LGR must be:

- Allocated to the same entity: the requestor (the entity that submits the selected IDNccTLD string),
- Delegated or transferred to the same entity, the IDNccTLD Manager, or withheld for possible future delegation to that IDNccTLD Manager.

In other words, for a selected top-level label T1, its allocatable variant label(s) T1V1,..., T1Vx shall only be allocated to the IDNccTLD requestor, or - after the delegation process for the selected IDNccTLD string has been initiated - delegated to the same IDNccTLD Manager or withheld for possible delegation to that IDNccTLD Manager.

⁹ Taking on suggestion to put “designated” between brackets. For later discussion input from the Arabic script/language community is needed on what the impact of this limitation would be.

¹⁰ **Section 14.3. Review of policy for the selection of IDNccTLD strings** It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances. It is also recommended that the ccNSO Council initiates such a review by launching a review group who will be tasked to review the ascertain whether the policy needs to be updated and advise the ccNSO Council on the proposed method for such an update. The scope and working method of such a review must be determined by the ccNSO after consulting relevant stakeholders, and consider the experience with the ccPDP4 process and relevant circumstances and developments with respect to IDN TLDs.

In the event such a review results in a recommendation to amend the policy, the rules relating to the country code Policy Development Process as defined in the ICANN Bylaws should apply.

If a specific IDNccTLD is operated by a “back-end” registry service provider under arrangement with the IDNccTLD Manager or will be operated by a “back-end” registry service provider under arrangement with the IDNccTLD Manager, then that “back-end” service provider must also operate all delegated variants of that specific IDNccTLD.

5.4 No selected IDNccTLD, no variants. According to sections 5.2.1 and 5.2.2 above, Variants of the chosen string are derived from and directly related to the selected IDNccTLD through the RZ-LGR; in other words, if there is no selected IDNccTLD, then there are no variants.

As a result, and as a general rule, the Selected IDNccTLD string's deselection must result in its variant strings' deselection.

However, this proposed policy does provide for a specific exemption on this general rule: If a Selected IDNccTLD is deselected as result of the lack of support by the Significantly Interested Parties (see section 4.2.2 for definition of SIP and section 12.5 below for the mechanism) then a Delegated Variant may remain to be delegated if the Significantly Interested Parties explicitly support continuation of the delegation of the Delegatable variant IDNccTLD string.

5.5 Requesting variants of already selected IDNccTLD strings. Under the Fast Track Process, a requestor could not request any variants. Variants can be calculated and applied for only after a script has been integrated into the RZ-LGR. According to Principle IV, requesting (and delegating) IDNccTLDs is an ongoing process.

It is implied in the Fast Track Process Implementation Plan (FIP) (section 3.4 of the FIP) and section 5.2.2 of this proposed policy that variants can be requested after the selected string was delegated (including Delegatable variants of IDNccTLD strings that were delegated under the Fast Track Process). However, as implied in section 3.4 of the Fast Track Implementation Plan IP and 5.2.2 above, a variant is only valid if, at the time of application, it is valid according to the RZ-LGR.

A Desired Variant String (a variant requested under the Fast Track Process) is only eligible if allocated according to the RZ-LGR when generated as variants through RZ-LGR.

Therefore, if according to the RZ-LGR at the time of submission of the application, the variant of a selected IDNccTLD string is an allocatable variant of that IDNccTLD string, it is “valid” under the RZ-LGR and eligible assuming all other criteria are met.

According to the RZ-LGR, if the requested variant is a blocked variant of the selected IDNccTLD string at the time of application submission, it is deemed “not valid” and, therefore, not eligible.

Finally, it is noted that the requester and relevant community using the script in which the IDNccTLD string is expressed are assumed to have participated in the related script generation panel. This would have allowed the requester and Significantly Interested Parties to build an alternative case concerning variant strings and their variants.

Section 6 Technical & Other String Requirements

6.1 Technical Criteria

The requested selected IDNccTLD string and its requested variants must abide by all Technical Criteria for an IDN TLD string. In addition to the proposed general requirements for all labels (strings), the selected IDNccTLD string must abide by the normative parts of RFC 5890, RFC 5891, RFC 5892, and RFC 5893.

All selected IDNccTLD strings must be processed using the RZ-LGR to determine:

1. If they are valid and
2. Calculate variant IDNccTLDs and determine whether the variant string is blocked or allocatable.

If the RZ-LGR is applied to the selected IDNccTLD string (for a script used to express the meaningful representation in the Designated Language), and this results in a variant ASCII 2-letter string (Any combination of two ISO 646 Basic Version (ISO 646-BV) characters¹¹ (2-letter [az] codes), these variants be:

- Blocked and
- Result in not allowing the selected IDNccTLD (to maintain the predictability of the current ccTLD delegation policy)

For the scripts and writing systems which have been integrated into the RZ-LGR, the RZ-LGR must be the only source for processing the following cases:

- Validate a requested IDNccTLD string and determine its variant string(s) with corresponding dispositions
- Calculate variant strings and corresponding disposition values for each one of the already delegated TLD Strings

All applicable technical criteria (general and IDN specific) for IDNccTLD strings should be documented as part of the implementation plan. They should be made public for transparency and accountability before the overall policy is implemented and endorsed by the ccNSO.

Validation that a string meets the technical criteria is a process step and shall be conducted by an external, independent panel. The recommended procedure is described in Section 7.

¹¹ Also known more commonly as ASCII. Note however that ASCII is a term that may describe various character sets: see <https://en.wikipedia.org/wiki/ASCII> (Reference updated following discussion 28 March 2023)

The technical and RZ-LGR conformity validation method and criteria should be developed as part of the implementation plan and are critical to the validation process. For transparency and accountability, they should be made public as part of implementing the overall policy and endorsed by the ccNSO before becoming effective.

6.1.1 Conformity to RZ-LGR

At the time the selected IDNccTLD string is submitted for validation, the script in which the selected IDNccTLD string is expressed must comply with the RZ-LGR, i.e. the Label Generation Rules (LGR) for the script/writing system in which the Designated Language is expressed must be integrated into the Label Generation Rules for the Root Zone.

If at the time the requested IDNccTLD string is submitted for validation, the LGR for the writing system or script in which the Designated Language is expressed has not been generated or is not yet integrated into the RZ-LGR, or if the selected IDNccTLD string is not in compliance with the RZ-LGR, then ICANN shall inform the requester and section 10, applies accordingly.

The risk of selecting a potential “invalid” string should remain with the selecting parties; hence, no review mechanism is necessary for this aspect of the process. Therefore, if a selected IDNccTLD string - of which the script is supported by the RZ-LGR - is “invalid” according to the RZ-LGR, it shall not pass the string evaluation phase, and section 10 below shall apply accordingly.

6.2 Confusing Similarity

6.2.1 Goal Confusing Similarity Validation.

The goal of the confusing similarity validation is to minimize the risk to the stability and security of the DNS due to user confusion by exploiting potential visual confusing similarity between domain names (e.g., being in Latin script vs. бe in Cyrillic). As such, confusing similarity should be minimized and mitigated. The risk of visually confusing similarity is not a technical DNS issue but can have an adverse impact on the security and stability of the domain name system.

6.2.2 Standard for Visual Similarity.

A selected IDNccTLD string is considered confusingly similar to one or more other string(s) (which must be either Valid-U-labels or any combination of two or more ISO 646 BV characters) if the appearance of the selected string in standard fonts in small sizes at typical screen resolutions is sufficiently close to one or more other strings so that it is probable that

a reasonable Internet user who is unfamiliar with the script would perceive the strings to be the same or confuse¹² one for the other¹³.

6.2.3 Base for Comparison Confusing Similarity of IDNccTLD Strings.

6.2.3.A Delineating the Scope of Request Side

Introduction. The primary question to determine the scope of the Request Side is which set of variants should be considered when considering a request for a selected string and requested Delegatable variants.

Note that according to section 5.2.3. The limitation of the delegation of variants above is that only a selected IDNccTLD string and its requested Delegatable variants can be requested and delegated. However, the set of strings to consider could be:

1. Only the selected string and the requested Delegatable variants
2. The selected string and all Delegatable variants
3. The selected string and all Allocatable variants of the selected string or
4. The selected string and all variants (Allocatable and Blocked)

Proposed Request Side. The request side for the Base for Comparison is comprised of and should always include the following:

- Selected string, and
- Requested Delegatable variants (only those allocatable variants, which are a meaningful representation of the name of the territory in the designated language and related script and requested at the time of submission of the request)

Secondly, the Similarity Evaluation Panel may include additional variants of the basic set of strings in the set of request side (including other non-delegatable allocatable variants and/or

¹² Please note that with respect to confusability SSAC emphasized in SAC089, which is a response in the context a proposals to amend the Fast Track EPSRP process (see:<https://ccnso.icann.org/en/workinggroups/epsrp.htm>)

"Confusability cannot be considered in isolation from other issues related to security. Phishing and other social engineering attacks based on domain name confusion are a security problem for end users. As such, adding a label to the root zone that is potentially confusable violates the Inclusion Principle's requirement that a TLD label be known to be 'safe'."

Note that SSAC's response and considerations were subsumed in and overtaken by the joint ccNSO-SSAC Statement to the ICANN Board form August 2017 (<https://ccnso.icann.org/sites/default/files/field-attached/epsrp-final-response-17aug17-en.pdf>)

¹³ Based on Unicode Technical Report #36, Section 2: Visual Security Issues

blocked variants), factoring in:

- The likelihood of misconnection
- Scalability, and
- Unforeseen and/or unwanted side effects.

In its report, the Panel must provide its reasoning for including or excluding additional variants of the basic set and, if so, which were included (see section 7.4.2.3)

6.2.3.B Delineating the Scope of Comparison Side.

Minimal scope of comparison side. Reiterating the goal of confusing similarity validation: The goal is to minimize the risk to the stability and security of the DNS due to user confusion by exploiting potential visual confusing similarity between domain names or paraphrasing in terms of SAC 060 (Examining the User Experience Implications of Active Variant TLDs). The goal is to minimize the risk of MISCONNECTION due to the visual confusability of two strings.

The minimum scope of the Comparison Side - before the introduction of variants - was¹⁴:

- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters¹⁵ (letter [a-z] codes),
- Existing TLDs or reserved names, or
- Proposed TLDs are in the process of string validation.

After the introduction of the variants, the minimum set of strings in the Comparison Side needs to be defined as:

- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters¹⁶ (letter [a-z] codes),
- Existing TLDs shall also include the delegated variants of the selected string or primary label and reserved names.
- Proposed TLDs which are in the process of string validation and their requested Delegatable or requested variant labels (however defined under the ccTLD and gTLD processes)

Secondly, it is proposed that the Similarity Evaluation Panel should determine which additional variants of the basic set of strings should be included in the Comparison Side, factoring in:

¹⁴ See section 5.5 String Confusion and Contention Fast Track Implementation Plan

(<https://www.icann.org/en/system/files/files/idn-ctld-implementation-plan-28mar19-en.pdf>)

¹⁵ International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

¹⁶ International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

- The likelihood of misconnection
- Scalability, and
- Unforeseen and/or unwanted side effects.

In its report, the Panel must provide its reasoning for its determination, whether or not to include additional variants of the basic set of strings were included in the comparison side and, if so, which (see section 8.4.2.3)

2. 4 String contention rule - String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS or should be avoided. Examples are situations whereby:

- A requested delegatable variant IDNccTLD strings is identical or confusingly similar to an existing TLDs or reserved names
- A requested (delegatable variant) IDNccTLD strings against other requested IDCccTLD strings, and
- A requested IDNccTLD strings against applied-for gTLD strings and related variants.

Although contentious situations between IDNccTLD requests and new gTLD applications are considered unlikely to occur, assessments of whether strings are considered confusingly like existing or applied-for new gTLD strings and their variants are made during the Similarity Validation for requested selected IDNccTLD strings and/or their eligible variants and in the Similarity Evaluation step envisioned in the next round of new gTLD applications.

The following supplemental rules provide the thresholds for solving any potential contention issues:

- A. Unless it is withdrawn, a gTLD application and/or related variants that the ICANN Board approves will be considered an existing TLD in inter-process contention. Therefore, any other later application for a similar string (whether primary or related variant) is deemed invalid.
- B. A validated request for an IDCccTLD and/or requested delegatable variant will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the exact string is deemed invalid.

For the above contention rules, an IDCccTLD string request is validated once it is confirmed that the string is a meaningful representation of the territory's name and that it has passed the Technical and Similarity Validation as described in sections 7.5 and 7.6.

6.3 Review of Section 6.2 and section 7.6.4.3

Section 6.2 (6.2.1 to 6.2.4) and section 7.6.4.3—specifically, the scope of the comparison, the role of the Similarity Evaluation Panel in determining the scope, and the impact on the validation of the selected IDNccTLD string—shall be the subject of the first review of the IDNccTLD string selection policy, as foreseen in Section 14, Review of policy for the selection of IDNccTLD strings.

Section 7 Validation of IDNccTLD Strings & Variant

7.1 Procedures for the submission of the selected string and related documentation

Unless otherwise stated, the procedure for submission of a requested string is considered a matter of implementation.

7.2 Administrative Validation of Selected String

After the requester has submitted a request for an IDNccTLD string, ICANN should at least validate that:

- The selected IDNccTLD refers to a Territory
- The selected string (A-label) does not exist in the DNS, nor is approved for delegation to another party
- The selected string (U-label) contains at least one (1) non-ASCII character
- The required A-label, U-label, and corresponding Unicode points to designate the selected IDNccTLD string are consistent
- Variant labels requested for delegation are identified as allocable variant labels of the selected string using the latest version of RZ-LGR
- Documentation on Meaningfulness is complete and meets the criteria and requirements
- Documentation on the Designated Language is complete and meets the criteria and requirements
- The documentation to support the selected string is complete, meets the criteria and requirements, and comes from an authoritative source

If one or more elements listed are not complete or deficient, ICANN shall inform the requester accordingly. The requester should be allowed to provide additional information, correct the request, or withdraw the request (and potentially resubmit later). If the requester does not take any action within three months after the notification by ICANN that the request is incomplete or contains errors, the request may be terminated by ICANN for administrative reasons and in accordance with section 10 below.

If all elements listed are validated, ICANN shall notify the requester accordingly and initiate the Technical and Confusing Similarity Validation Process (see section 7.3 below).

If ICANN staff anticipates issues about the Technical and String Confusion Review during its initial application review, ICANN staff is advised to inform the requester of its concerns. The requester will have the opportunity to either:

1. Change the selected string,

- or
2. Tentatively request two or more strings as part of the application, including a ranking of the preference to accommodate the case where the preferred string is not validated,
or
 3. Withdraw the request,
or
 4. Continue with the request as originally submitted.

Details of the verification procedures and additional elements, such as the communication channel, will need further detailed. This is considered a matter of implementation.

7.3 Technical, RZ-LGR and Similarity Validation

The Details for the Technical, RZ-LGR and Similarity Validation process are considered a matter of implementation, considering, and building on the proposals below under sections 7.3.1 – 7.8.6. Concerning the Technical, RZ-LGR and Similarity Validation, it is noted that the procedures and Guidelines developed under the IDNccTLD Fast Track Implementation Plan provide a tested and operational example.

7.3.1 General description of Technical and Similarity validation

The goal of the Technical, RZ-LGR and Similarity Validation is to provide external and independent advice to the ICANN Board whether a selected string and/or its requested Delegatable variant(s) meet(s) the required technical and RZ-LGR criteria and is/are not considered to be confusingly similar.

If, according to the final, definite outcome of the validation, a selected string does not meet one or more of the technical criteria or RZ-LGR and/or is considered confusingly similar to another string, the requested IDNccTLD string is/ are deemed to be invalid and not eligible under this policy.

It is recommended that ICANN appoint the following external and independent Panels:

- **Technical Panel.** To validate that the technical requirements under this policy are met (section 6.1.1), a “Technical Panel¹⁷” shall be appointed to conduct a technical evaluation of the selected IDNccTLD string.
- **Similarity Evaluation Panel.** To validate a string for string similarity, ICANN shall appoint an external and independent “Similarity Evaluation Panel” (Hereafter: SEP).

¹⁷ Or any other name ICANN would prefer.

The SEP shall conduct the Confusing Similarity evaluation of the string, including determining the scope of the Comparison Base.

The confusing similarity validation process is, by definition, subjective. Therefore, to determine the scope of the Comparison Side, the Panel is expected to include at least one person familiar with the script in which the selected string is expressed.

- **Similarity Review Panel.** When the IDNccTLD requester requests a review to validate that the selected IDNccTLD string is not confusingly similar, an external and independent Similarity Review Panel (hereafter: SRP) shall be appointed to allow for a final confusing similarity validation.

Due to the specific nature of confusing similarity and its inherent subjective assessment, the findings of the SEP are reviewed by an external and independent SRP, but only upon request by the IDNccTLD string requester. This SRP review of the requested IDNccTLD string is expected to use a different assessment framework. The “Similarity Review” is considered a specific review mechanism, not to be confused with the general ccTLD Review Mechanism (see section 13 below). It is expected that this Panel will not include members from one of the other Panels called for under this policy.

- **Risk Treatment Appraisal Panel.** If either or both the SEP and/or SRP have found the requested string confusingly similar, an external and independent Risk Treatment Appraisal Panel (Hereafter: RTAP) shall be appointed when the IDNccTLD requester requests such an appraisal to allow for an assessment of the risk mitigation treatment.

7.4 Procedures for Technical Validation & RZ-LGR Validation

1. After completion of the ICANN staff validation of the request (see Section 7.2 above), ICANN staff will submit the selected IDNccTLD string to the “Technical Panel” for the Technical & RZ-LGR validation.
2. The Technical Panel conducts a technical string evaluation of the string and its variants submitted for evaluation. If needed, the Panel may ask questions for clarification through ICANN staff.
3. The results of the evaluation will be reported to ICANN staff. In its report, the Panel shall include the Panelists' names, document its findings, and the rationale for the decision.

After being constituted, the Panel is expected to complete its evaluation and send its report to ICANN staff within 30 days of receiving the IDNccTLD string to be evaluated. If

the Panel expects to need more time, ICANN staff should be informed accordingly. ICANN staff shall then notify the requester.

If, according to the technical validation, the selected IDNccTLD string and requested variants, if any, meet(s) all the technical criteria, the string is technically validated. If the selected IDNccTLD string fails to meet the technical criteria, the requested string, and the requested variants, if any, are not valid under the policy.

If, according to the technical review, the selected IDNccTLD string meets all the technical criteria, but one or more of the requested variants does not meet the technical criteria, only the requested variants that do not meet the technical criteria are not valid under the policy.

ICANN staff shall inform and notify the requester accordingly, and section 10 below applies.

7.5 Procedures for Confusing Similarity Validation

Introduction. As part of the validation process, external and independent advice to the ICANN Board is provided on whether a selected string is not considered to be confusingly similar.

If, according to the Confusing Similarity Validation, the selected IDNccTLDs string and/or its requested Delegatable variant(s) is/are considered confusingly similar, the requested IDNccTLD string(s) is/are not valid and hence not eligible under this policy.

To validate that the string(s) are not considered to be confusingly similar, the validation process includes the following procedures:

- **Similarity Evaluation.** The Similarity Evaluation is detailed in section 7.6 below.
- **Similarity Review.** The Similarity Review is detailed in section 7.7 below.
- **Risk Treatment Appraisal Procedure.** The Risk Treatment Appraisal is detailed in section 7.8 below.

7.6 Similarity Evaluation – Procedural aspects

7.6.1 After submitting the requested IDNccTLD string(s), ICANN staff shall submit the selected IDNccTLD string to the Similarity Evaluation Panel (SEP) for the confusing similarity string evaluation.

7.6.2 The Panel shall conduct a confusability string evaluation of the string(s) submitted for evaluation. The Panel may ask questions for clarification through ICANN staff.

7.6.3 The evaluation results will be reported to ICANN staff. In the report, the Panel will include the panellists' names, document the decision, and provide its rationale for the scope of the Comparison Side and the decision.

Where the string is confusingly similar, the report shall, at a minimum, include a reference to the string(s) to which the confusing similarity relates and examples (in fonts) where the panel observed the similarity.

ICANN staff shall inform and notify the requester accordingly.

7.6.4 Results of the Similarity Evaluation

7.6.4.1 If, according to the evaluation, the Panel does not consider the requested string(s) to be confusingly similar, the selected IDNccTLD and/or Delegatable variants are validated.

7.6.4.2 If, according to the panel's evaluation, the selected string and/or one or more Delegable variant IDNccTLD string(s) presents a risk of string confusion with a (variant) (IDN)ccTLD string associated with the same Territory as the requested IDNccTLD string(s), this should be noted in the report. ICANN staff shall inform the requester accordingly.

If, within three months of receiving the report, the requester shall confirm that:

- (i) The intended manager and intended registry operator for the IDNccTLD and the ccTLD manager for the confusingly similar country code are the same entity, and
 - (ii) The intended manager of the IDNccTLD shall be the entity that requests the delegation of the IDNccTLD string, and
 - (iii) The requester, intended manager and registry operator and, if necessary, the relevant public authority, accept and document that the IDNccTLD and the ccTLD with which it is confusingly similar will be and will remain operated by the same manager, and
 - (iv) The requester, intended manager and registry operator and, if necessary, the relevant public authority agree to specific and pre-arranged other conditions to mitigate the risk of user confusion when the IDNccTLD becomes operational;
- Then, the IDNccTLD string will be deemed valid.

If either the requester, intended manager or the relevant public authority does not accept these pre-arranged conditions within three months after notification or at a later stage refutes the acceptance, the IDNccTLD shall not be validated.

Alternatively, the requester may defer from this mechanism and use the review or risk mitigation procedure described below.

7.6.4.3 – Invalid String(s)- Request similarity review or Risk Mitigation

If, according to the evaluation of the selected IDNccTLD string and/or variants, the selected string and/or one or more of the evaluated variant(s) is/are found to present a risk of string confusion, ICANN staff shall inform the requester, considering section 10 below.

The requester may call for a Similarity Review or Risk Mitigation Appraisal and may provide additional documentation and clarification referring to aspects in the Panel report. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN and include the additional documentation, if any, in the notification to ICANN. After receiving the notification from the requester, ICANN staff shall call on the Similarity Review Panel (SRP) or Risk Treatment Appraisal Panel (RTAP).

If the requester has not requested a Similarity Review or Risk Mitigation Appraisal within three months after ICANN, the date of notification by ICANN, the selected string and/or requested variant(s) are deemed invalid, and section 10 applies.

IDNccTLD strings, which were delegated before the date this proposed policy becomes effective, are not affected by section 7.6.4.3 if (a) Delegatable variant(s) of that IDNccTLD is/are requested and found to be confusingly similar.

7.7 Similarity Review

7.7.1 Similarity Review Procedure

The SRP can be requested to conduct a second and final confusing similarity assessment of the requested IDNccTLD string if:

- 1) The selected IDNccTLD string is deemed to be invalid, and
- 2) The request for a Similarity Review is received by ICANN within three (3) months after ICANN's notification of the results of the Similarity Evaluation.

7.7.2 The SRP conducts its review based on the standard methodology and criteria developed for it. It considers, but is not limited to, the findings of the Similarity Evaluation Panel and all the related documentation from the requester, including additional documentation submitted under section 7.6.4.3 above. The SRP may ask questions for clarification through ICANN staff.

7.7.3 The results of the SRP shall be reported to ICANN staff and publicly announced on the ICANN website. This report shall include the name of the SRP Panelists, document the findings of the SRP, including the rationale for the final decision, and, in case of the risk of confusion, a reference to the strings that are considered confusingly similar and examples where the panel observed this similarity.

If, according to the Similarity Review, the SRP does not consider the string to be confusingly similar, the selected IDNccTLD and/or its requested variant(s) are valid.

If, according to the Similarity Review, the SRP considers the string confusingly similar, the selected IDNccTLD and/or its requested variant(s) are invalid.

7.8 Risk Treatment Appraisal

7.8.1 The Objective of the Review of Risk Treatment Appraisal. The objective is to determine if the risk will be effectively mitigated, i.e., if the Similarity Evaluation or Similarity Review has determined that the requested string is confusingly similar in uppercase only (and not in lowercase), the proposed mitigation measures reduce the risks associated with the confusing similarity to an acceptable level or threshold.

7.8.2 Base for Appraisal. The proposed mitigation measures should be evaluated in relation to the strings identified by the relevant panel (SEP or SRP) as confusingly similar to the requested string(s).

7.8.3 Standard of Appraisal. The RTAP Panel should consider the likelihood of confusing similarity with specific consideration of confusability from the perspective that any domain name may be displayed in either upper- or lower-case, depending on the software application and regardless of the user's familiarity with the language or script.

The proposed mitigation measures meet the objective of Risk Treatment Appraisal if:

- The requester has clarified how the risk management process and proposed mitigation measures meet the objective and criteria of the Risk Treatment. This should be evaluated together with the confusability findings.
- The residual level of risk, if any, due to domain names' confusability is expected to be in the same range as that which would occur by adding another IDNccTLD that has not been found similar to an existing or reserved TLD.

7.8.4 Criteria to appraise the Risk Treatment proposals. To appraise whether the proposed risk mitigation meets the objective of the RTA, the proposed risk mitigation measures should be:

- **Proportionate.** The mitigation measures will be in proportion to the risks identified. The higher the risks, the greater the mitigation measures will be required; conversely, lower mitigation measures will be a proportionate response to risks that are identified as low severity or low likelihood,
- **Adequate.** For each of the case(s), the measures should reduce the risk of user confusion arising from the potential use of the applied-for TLD to an acceptable level. The residual level of risk, if any, due to the confusability of domain names is expected

to be in the same range as what would occur by adding another IDNccTLD, which has not been found similar to existing or reserved TLD.

- **Self-contained.** The proposed mitigation measures can only apply to the registration policies of the applied-for TLD and do not assume any restrictions on the availability or registration policies of other current or future TLD labels.
- **Global Impact.** The proposed mitigation measures must have global applicability and not apply only to confusability within the intended user community.

7.8.5 Conditions for Eligibility of the RTA. Only under the following set of conditions is a request for the RTA eligible:

- I. The SEP evaluation and—if reviewed by the SRP—the SRP review have determined that the requested string is confusingly similar in uppercase only.
- II. The requester has filed a request for a review of its proposed mitigation measures within three months from the date the SEP and/or SRP results have been communicated to the requester.
- III. In the request for the appraisal of proposed mitigation measures, the requester has included - at a minimum – a reference to the proposed, internationally recognized, and appropriate risk management and mitigation process the requester intends to use and the related, proposed mitigation measures (hereafter the Risk Mitigation Plan or RMP).
- IV. The IDNccTLD Manager, and if so, required the relevant public authority, commits to implement the proposed and agreed upon mitigation measures as of the moment the IDNccTLD becomes operational.

If the above conditions are met, an independent panel (the ‘RTAP Panel’) appointed by ICANN will review and evaluate the proposed methodology and related mitigation measures.

7.8.6 Result of Risk Treatment Appraisal.

The result of the RTA procedure is either:

A documented and consolidated recommendation from the RTAP, following consultations with the requester, confirming that:

- a The requester has adopted an appropriate risk management methodology and framework;
- b The mitigation measures are proportionate and adequate to treat the risk(s) identified by the SEP or SRP (as the case may be);
- c The requester/ IDNccTLD manager has committed to implementing the mitigation measures before or on the launch of the IDNccTLD string(s);
- d The requested IDNccTLD string(s) is/are considered valid.

or

A documented recommendation confirming the risk is not adequately treated, given the list of mitigation measures proposed by the requester or IDNccTLD Manager and the requested IDNccTLD string(s) is/are considered invalid.

The RTAP's recommendation will be made public.

Section 8 Publication of IDNccTLD string

After completing the request validation procedure and ensuring that the IDNccTLD string is valid according to the Technical and String Similarity Validation procedures, ICANN shall publish the IDNccTLD String publicly on its website.

Section 9 Completion of IDNccTLD selection process

Once the selected IDNccTLD string is published on the ICANN website and the IDNccTLD selection process is completed, delegation of the IDNccTLD string may be requested per the current policy and practices for the delegation, transfer, and retirement of ccTLDs. ICANN shall notify the requester accordingly.

Section 10. Change, withdrawal, or termination of the request

ICANN staff shall notify the requester of any errors in the application. These errors include, but are not limited to:

- The selected string is already delegated in the DNS or approved for delegation to another party.
- Issues pertaining to the required documentation.
- The country or territory of the request does not correspond to a listing in the ISO3166-1 list.
- If the selected string is invalid by one or both of the independent Validation procedure(s).

If such errors emerge, ICANN staff should contact the requester, who should be provided the opportunity to:

- Amend, adjust, or complete the request under the same application to abide by the criteria,
or
- Withdraw the request.

If the requester does not respond within three calendar months of receiving the notice from ICANN staff, the request will be terminated administratively.

Details of the procedures and additional elements, such as the communication channel, must be further documented. This is considered a matter of Implementation.

Section 11 Delegation, Transfer, Revocation of IDNccTLDs

11.1.1 Delegation of an IDNccTLD must be per current policies, procedures, and practices for delegation of ccTLDs

Once the IDNccTLD string has been selected and the String Validation has been successfully concluded, the delegation of an IDNccTLD shall be according to the policy and practices for the delegation of ccTLDs. This means that the policies and practices for delegation, transfer, revocation, and retirement of two-letter country code TLDs apply to IDNccTLDs.

11.1.2 Delegation of variant(s) of the selected IDNccTLD must be per current policies, procedures, and practices for delegation of ccTLDs

All ccTLD-related policies regarding the delegation, transfer, revocation, and retirement of ccTLDs apply to the delegation, transfer, revocation, and retirement of (Delegatable variant(s)) of the selected IDNccTLD. However, specific requirements under a related policy may vary for the selected IDNccTLD string and its variants.

If a selected IDNccTLD string is delegated under the existing relevant policy for delegation of ccTLDs, the whole set of Delegatable IDNccTLD variants shall be delegated to the same entity, based on the request for delegation of the selected IDNccTLD string, unless otherwise foreseen under this policy.

If a selected IDNccTLD string is requested to be transferred to another entity per RFC1591 as interpreted by the FoI or later version of the policy, the whole set of allocatable IDNccTLD strings shall be transferred to the same other entity, based on and following the request for transfer of the selected IDNccTLD string, unless otherwise foreseen under this policy.

If a selected IDNccTLD string or any of its Delegatable variants is revoked per RFC1591 as interpreted by the FoI, all Delegatable variant IDNccTLDs (delegated or ~~withheld~~ for future delegation) shall be revoked.

If the selected IDNccTLD string should be retired as foreseen under this policy, all delegated variant IDNccTLD strings shall be retired unless otherwise foreseen under this policy.

Implementing this and other recommendations of variant IDNccTLD strings is considered a matter of implementation.

11.1.3 All delegated variant IDNccTLD strings must be operated by the same entity. If the IDNccTLD Manager operates a specific IDNccTLD, all variants must be operated by the same IDNccTLD Manager (Definition: the IDNccTLD Manager is the entity or organization listed in the IANA root zone database as the ccTLD Manager for a specific IDNccTLD).

If a selected specific IDNccTLD is operated by a "back-end" registry service provider under arrangement with the IDNccTLD Manager or will be operated by a "back-end" registry service provider under arrangement with the IDNccTLD Manager, that "back-end" service provider must operate all delegated variants of that IDNccTLD.

Section 12 – Deselection of IDNccTLDs and related variants

12.1 General Deselection of the IDNccTLD and its related variants. If an entry of a Territory is removed from ISO3166 because it is divided into two or more new Territories or two or more Territories have merged, the removal is considered a “trigger event.” It initiates the process for the retirement of all the selected IDNccTLD(s) and – if applicable - their variants, which are a meaningful representation of the name of the Territory.

If the name of a Territory is removed from ISO3166 because it is divided into two or more new Territories or two or more Territories have merged, the removal is considered a “trigger event” and causes the initiation of the process for the retirement of all the selected IDNccTLD(s) (and their variants), which are a meaningful representation of the name of the **Territory**. However, if a selected IDNccTLD string is a meaningful representation in the Designated Language of the merged Territory, and the Significantly Interested Parties of the “merged” Territory support the IDNccTLD, it should not be retired. The basic criteria for only one (1) IDNccTLD string per Designated Language apply (section 3.2.3 above). So, if there is already an IDNccTLD for the merged territory in the same Designated Language, the IDNccTLD of the Territory subsumed in the other Territory shall need to be retired.

12.2 Impact change of name of the Territory. The general policy requirement is that an IDNccTLD string must be a Meaningful Representation of the name of a Territory. The principle underlying the representation of Territories in two-letter (ASCII) code elements is the visual association between the names of Territories (in English or French, or sometimes in another language) and their corresponding code elements.

The principle of association between the IDN country code string and the name of a Territory must be maintained: a selected IDNccTLD string must be a meaningful representation of the Territory's name, and hence, if the selected IDNccTLD string is no longer a (visual) association with the Territory's name, it should be deselected.

The IDNccTLD will be considered deselected and should be retired when it is evidenced that a selected and /or delegated IDNccTLD string is no longer a Meaningful Representation of:

- a) The name of the Territory in the Designated language of the Territory,
- b) Part of the name of the Territory in the Designated language of the Territory that denotes the Territory or
- c) The short-form designation for the name of the Territory in the Designated Language of the Territory (for example, the two-letter or three-letter country code transliterated into the Designated Language).

The deselection of an IDNccTLD string is evidenced as follows:

1. If the meaningfulness requirement at the time of the delegation of the string was verified by a listing (part of the name) in the Designated Language of the Territory in the UNGEGN Manual, the name of the Territory in the Designated Language is no longer included.
2. If the meaningfulness was substantiated by providing documentation from an internationally recognized expert or organization¹⁸, by documentation or a statement of a similar, internationally recognized expert or organization that the selected string no longer denotes the name nor is a short-form designation for the name of the Territory in the Designated language of the Territory (hereafter: Statement of (dis-)association or if such a statement cannot be provided within a reasonable time (3 months) upon request of ICANN.

Confirmation of association or disassociation.

ICANN is not expected to actively seek confirmation of the association or disassociation of an IDNccTLD string with the territory's name.

However, if ICANN receives a valid request¹⁹ for an IDNccTLD string for a Territory which is in the same Designated Language and related script as an IDNccTLD string associated with the same Territory that is either in the verification process or has been delegated, ICANN shall require a Statement of (dis-)association from the requester or IDNccTLD Manager of the first IDNccTLD string for the name of the Territory.

If such a Statement of (dis-)association cannot be provided within a reasonable time frame (3 months upon notification by ICANN), the first IDNccTLD string is deemed deselected and shall be retired. As of the time a Statement of (dis-)association is

¹⁸ Note already included): ICANN should recognize and accept documentation from one of the following experts or organizations as internationally recognized:

- National Naming Authority – A government recognized National Geographic Naming Authority, or other organization performing the same function, for the Territory for which the selected string request is presented. The United Nations Group of Experts on Geographical Names (UNGEGN) maintains such a list of organizations at:
<https://unstats.un.org/unsd/geoinfo/ungegn/publications.html> [unstats.un.org]
- National Linguistic Authority – A government recognized National Linguistic Authority, or other organization performing the same function, for the Territory for which the selected string request is presented. In the exceptional circumstance where there is no access to a National Naming Authority nor to a National Linguistic Authority for the Territory, assistance may be requested from ICANN to identify and seek reference to an expert or organization to provide the required documentation. This documentation will be considered acceptable and sufficient to determine whether a string is a Meaningful Representation of a Territory name.
See section 1.2.5.

¹⁹ Note this includes documentation of support by the SIP!!

requested until the Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD strings for that Territory shall be put on hold.

If, according to the Statement of (dis-)association, the first requested IDNccTLD string or delegated IDNccTLD string is still associated with the name of the Territory as required, the latter requested IDNccTLD string shall be considered invalid. The requester and the related government will be informed accordingly.

ICANN should include in the implementation plan an example of the required documentation, i.e., the Statement of (dis-) association.

12.3 Impact Change of Designated Language. The general policy requirement is that to be considered an IDNccTLD string; it must be a Meaningful Representation of the name of the Territory in a Designated Language of the Territory. For this purpose, a Designated Language is defined as a language with a legal status in the Territory or as a language of administration²⁰.

The IDNccTLD will be considered deselected and should be retired if it is evidenced that a selected IDNccTLD string that is either in the validation stage or is delegated as an IDNccTLD is no longer a Meaningful Representation in a Designated Language of the Territory.

A language is evidenced to be no longer Designated:

- If at the time of the request of the IDNccTLD string, the Designated Language requirement was demonstrated and verified by a reference to the listing of (part of the) name of the Territory in the Designated Language in the UNGEGN Manual, the name of the Territory is no longer included in the Designated Language (see for the relevant Territory as an ISO 639 language in Part Three of the “Technical Reference Manual for the Standardization of Geographical Names,” United Nations Group of Experts on Geographical Names (the UNGEGN Manual) (https://unstats.un.org/unsd/geoinfo/ungegn/docs/11th-uncsgn-docs/E_Conf.105_13_CRP.13_15_UNGEGN%20WG%20Country%20Names%20Document.pdf)).

²⁰ The definition of Designated Language is based on: “Glossary of Terms for the Standardization of Geographical Names”, United Nations Group of Experts on Geographic Names, United Nations, New York, 2002 https://unstats.un.org/unsd/ungegn/pubs/documents/Glossary_of_terms_rev.pdf. Note that in the Glossary the term “Official Language” is used. Experience has shown that, depending on the specific Territory, “Official Language” has a specific connotation, which sometimes creates confusion with the term “Official Language” as defined in the Glossary.

- If, at the time of the request of the IDNccTLD string, the Designated Language requirement was demonstrated and verified by referencing it as an administrative language for the relevant Territory as defined in section 3.7 of ISO 3166-1 standard [2020], the language is no longer referenced as such.
- If the relevant public authority in the Territory confirms that the language is no longer used in official communications of the appropriate public authority or serves as a language of administration (Statement of Designation of Language)

If it is evidenced that a language is no longer a Designated Language in the Territory, the related IDNccTLD string for the territory's name is considered deselected, and if delegated, the IDNccTLD must be retired.

Confirmation of association or disassociation.

ICANN is expected to refrain from actively seeking confirmation of a language's change of status in the Territory.

However, if ICANN receives a valid request²¹ for an IDNccTLD string for a Territory which is in the same Designated Language as another IDNccTLD string associated with the same Territory and the latter is either in the verification process or has been delegated, ICANN shall require a Statement of Designation of Language from the requester or IDNccTLD Manager of the IDNccTLD string being verified or delegated (whatever the case may be). The Statement of Designation of Language must be provided by a similar relevant public authority that provided the original documentation.

If such a Statement of Designated Language cannot be provided within a reasonable time frame (three months upon notification by ICANN), the IDNccTLD, already in the process of being verified string or already delegated, is deemed to be deselected and shall be retired. As of the time a Statement of Designated Language is requested until the Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD string for that Territory shall be put on hold.

If, according to the Statement of Designated Language, the language remains a Designated Language, the (second) requested IDNccTLD string in the same Designated Language of the Territory shall be considered invalid, and the requester and the related government should be informed accordingly.

²¹ Note this includes documentation of support by the SIP as described in section 4.

ICANN should include an example of the Statement of Designated Language in the implementation plan.

12.4 Impact change of script or writing system.

The general policy requirement is only one (1) IDNccTLD string per Designated Language. If there is more than one Designated Language in the Territory, one (1) unique IDNccTLD for each Designated Language may be selected, provided the Meaningful Representation in one Designated Language cannot be confused with an existing IDNccTLD string for that Territory.

Further, where a language is expressed in more than one script in a Territory, having one string per script is permissible. However, the multiple strings are in the same Designated Language. For that matter, the documentation to request an IDNccTLD string must include a reference to the script or scripts in which the Designated Language is expressed, which MUST be listed in the script charts of the latest version of UNICODE.

If it is evidenced that in the Territory, a Designated Language is no longer expressed in the script or scripts in which the IDNccTLD string associated with the Territory was expressed at the time it was requested, then that IDNccTLD string shall be considered deselected and if delegated, must be retired.

Confirmation of script to express Designated Language. ICANN is expected to refrain from actively seeking confirmation of a change of status of the script in which a Designated Language in the Territory is expressed.

However, if ICANN receives a valid request²² for an IDNccTLD string for a Territory in the same Designated Language as another IDNccTLD string associated with the Territory but expressed in another script, ICANN shall require a Statement of Referenced Script from the requester or IDNccTLD Manager of the IDNccTLD string already being verified or delegated (whatever the case may be). The Statement of Referenced Script must be provided by a similar relevant public authority that provided the original documentation concerning the referenced script.

If such a Statement of Referenced Script cannot be provided within a reasonable time frame three months upon notification by ICANN), the IDNccTLD, already in the process of being verified string or already delegated, is deemed to be deselected and shall be retired. As of the time a Statement of Referenced Script is requested until the

²² Note this includes documentation of support by the SIP as described in section 4.

Statement is provided or after the reasonable time frame has passed (whatever is the earliest), the processing of the requested IDNccTLD string for that Territory shall be put on hold.

If, according to the Statement of Referenced Script, the Designated Language remains to be expressed in the script initially referenced, the (second) requested IDNccTLD string in the same Designated Language of the Territory shall be considered invalid, and the requester and the related government should be informed accordingly.

ICANN should include an example of the Statement of Referenced Script in the implementation plan.

12.5 The selected IDNccTLD string becomes contentious within the Territory.

The general policy requirement is that the selected IDNccTLD string be non-contentious within the Territory. The non-contentiousness is evidenced by a statement of support/endorsement/non-objection by the Significantly Interested Parties (SIP) in the Territory.

If it is evidenced that the selected IDNccTLD string has become contentious within the Territory, it shall be retired according to the policy for retiring ccTLDs.

A statement from the Significantly Interested Parties in the Territory stating that the IDNccTLD string is contentious (Hereafter: Statement of Deselection) evidences its contentiousness.

The definition of Significantly Interested Parties (section 4.2.1) and Classification of input (section 4.2.2) apply to the procedure.

To be effective, the Statement of Deselection must be published on the ICANN Website. Before publication, ICANN shall inform the IDNccTLD Manager of receipt of such a Statement of Deselection.

If a concurrent SIP statement in support of the IDNccTLD string(s) is received by ICANN before the Notification of Retirement is provided to the Manager of the deselected IDNccTLD string, this SIP Statement and the Statement of Deselection shall be deemed to be conflicting within the Territory. Before any further steps are taken in the retirement process, this issue must be resolved in the Territory.

If a request for an IDNccTLD string in the same Designated Language for the same Territory is received at the same time or after the Statement of Deselection is received

but before the date the Notification of Retirement is sent, then the issue of contradicting statements concerning the deselection of the IDNccTLD string needs to be resolved in Territory, before any further steps are taken in the deselection process of the delegated IDNccTLD string and/or validation process for the newly requested IDNccTLD string.

12.6 Review Mechanism. The Review Mechanism for IANA Function Operator decisions is available to the IDNccTLD Manager, who receives a Notification of Retirement under sections 12.2, 12.3 or 12.4, and 12.5. when the Review Mechanism becomes available.

Section 13 Applicability of cc Review Mechanism

13.1 Decisions subject to the cc Review Mechanism. After adoption and implementation, some proposals may result in an ICANN decision to deselect an IDNccTLD string and/or its variants and, hence, to retire an IDNccTLD or its variants. According to the ccTLD retirement policy (as adopted in September 2022), the retirement of an (IDN)ccTLD requires the IFO to serve a Notice of Retirement to the (IDN)ccTLD Manager. This Notice formally starts the (clock of the) ccTLD retirement process.

Similar to the proposed ccPDP3 Review Mechanism policy – if a ccTLD Manager is directly impacted by a Notice of Retirement for a two-letter Latin ccTLD which does not correspond to an ISO 3166-1 Alpha-2 Code Element - it is proposed that the review mechanism should be available to an IDNccTLD Manager who is served a Notice of Retirement following the deselection of an IDNccTLD string and/or its variants strings resulting from:

- Change of Name of the Territory, Change of designated language, Change of script or writing system (sections 13.2, 13.3 and 13.4)
- Impact IDNccTLD string becomes contentious within the Territory (Section 13.5)

13.2 Non-applicability IRP/Reconsideration

In July 2022, the ccNSO Council requested that the ccPDP4 WG look at the need for further clarification of the ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii) and, if clarification is needed, make a recommendation to that effect.

The ccPDP 4 WG makes the following recommendations regarding ICANN Bylaws Sections 4.2 (d) (i) and 4.3 (c) (ii):

- As IDNccTLDs are ccTLDs, all disputes and claims related to the delegation, transfer, and revocation of IDNccTLDs shall remain excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions (IRP).
- As IDNccTLDs are ccTLDs, all disputes and claims related to the retirement of an IDNccTLD shall be excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions.
- It is recommended that the relevant section of the ICANN Bylaws be amended accordingly, including but not limited to amending the terms “delegation and re-delegation” to “delegation, transfer, revocation and retirement,” and, if considered advisable for the avoidance of doubt, replacing “ccTLDs” with “ccTLDs and IDNccTLDs.” Amendment of the Bylaws is considered a matter of implementation.
- The ccNSO is advised to consider that any future policy to be developed by the ccNSO and which can affect the stewardship of a ccTLD, including an IDNccTLD, should include a consideration of whether claims and disputes flowing from the application of the policy should be excluded from ICANN’s Reconsideration Process and the Independent Review Process for Covered Actions, and if so, explicitly specify the outcome of this consideration in any such policy.

Section 14. Miscellaneous

14.1. Confidentiality of information during the validation process unless otherwise foreseen.

It is recommended that ICANN keep the information and support documentation for the selection of an IDNccTLD string confidential until it has been established that the selected string meets all criteria. However, relevant information will have to be shared with the external panels as foreseen in section 7 above and the similar panels for new gTLD applications for the purpose of conducting their business. Further details are considered a matter of implementation.

14.2. Transitional arrangement regarding IDNccTLD strings under the Fast Track IDNccTLD Process

1. **Closure of Fast Track Process.** The Fast Track Process must be closed when ccPDP4 is fully implemented and operational for processing requested selected IDNccTLD strings. As the ccPDP4 becomes operational, new requests for a selected IDNccTLD string or requests for variant IDNccTLD strings must be processed through the implemented ccPDP4 policy.
2. If the IDNccTLD request process based on ccPDP4 becomes operational, an IDNccTLD string request is still in process under the Fast Track Process, and the request must be completed through the Fast Track Process. Completion results either in the publication of the selected IDNccTLD string in accordance with section 5.6.4 of the Fast Track Implementation Plan or in the requestor's withdrawal or ICANN's termination of the request in accordance with section 5.4 of the Fast Track Implementation Plan²³.
3. All IDNccTLD strings that have been validated under the Fast Track Process will be deemed validated under the ccNSO policy for selecting IDNccTLD strings and are grandfathered. The recommendations under this policy development

²³ <https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf> . From the FIP: *“Several of the steps in the Request Submission for String Evaluation (Stage 2) allow for a requester to withdraw a request. It is also possible that ICANN will terminate a request if the request contains certain errors. “In addition, several circumstances are listed in the FIP, which trigger a termination by ICANN, for example, according to Section 5.6.3 “If the requester has not notified ICANN within three (3) calendar months after the date of notification by ICANN of DNS Stability Panel findings, the Termination Process will be initiated. See section 5.4 “*

process concerning the deselection of IDNccTLD strings shall apply to the grandfathered IDNccTLD strings.

14.3. Review of policy for the selection of IDNccTLD strings.

It is recommended that the policy be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances. It is also recommended that the ccNSO Council initiates such a review by launching a review group tasked to review and ascertain whether the policy needs to be updated and advise the ccNSO Council on the proposed method for such an update. The ccNSO must determine the scope and working method of such a review after consulting relevant stakeholders and consider the experience with the ccPDP4 process and appropriate circumstances and developments concerning IDN TLDs

If such a review results in a recommendation to amend the policy, the rules relating to the country code Policy Development Process as defined in the ICANN Bylaws should apply.

14.4. Verification of Implementation

It is anticipated that some parts of the recommendations and process steps will need to be further refined and interpreted by ICANN staff before implementation. It is further expected to be done through an implementation plan or similar planning document. It is therefore recommended that the ccNSO monitors and evaluates the planned implementation of recommendations, and the ccNSO Council reviews and approves the final planning document before staff implementation.

14.5. Review of the IDNccTLD Fast Track Process

Concerning the update of the Fast Track Process Implementation Plan, the ccNSO has requested a standstill on the evolution of the Fast-Track process. See [letter ccNSO to the ICANN Board of Directors](#) and response from the [Chair of the Board](#).

This approach is supported, and the evolution of the Fast-Track Process, if at all, should be limited to addressing issues that cause a demonstrable threat to the security and stability of the DNS and, to be resolved, require an amendment of the Fast-Track Process before completion and implementation of the envisioned ccPDP4.