

Responses to Informational Request from IDN EPDP Leadership Team on the Following Outputs: Rec. 8, IG 9, Rec. 12, Rec. 13

Recommendation 8 & Implementation Guidance 9:

ICANN org has reviewed the IDN EPDP Outputs concerning Preliminary Recommendation 8 and has not identified any concerns with the implementation of this recommendation. However, in connection with Implementation Guidance 9, you may be aware that the GNSO Council [approved](#) a resolution to defer the next steps of Phase Two of the RPMs PDP for 18 months beginning 20 April 2023. As also [noted](#) in the GNSO Council's list of projects and ongoing activities, the Council has yet to confirm the start and projected timeline of Phase Two of the RPMs PDP to review the UDRP.

As such, our understanding from the Implementation Guidance 9 is that ICANN org would not be in a position to implement the output until the completion of Phase Two of the RPMs PDP. In the meantime, if there are IDN variant domain name registrations, the desired outcome per Recommendation 8 will not be achieved. It would be helpful if the IDN EPDP Team could clarify whether it envisions that implementation of Preliminary Recommendation 8 should be delayed until policy discussions on the UDRP have concluded, or that the implementation would occur as part of the work with an Implementation Review Team (IRT) for the IDN EPDP Phase 2 recommendations.

(Side note: the org considered the scenario of one set of policy recommendations modifying another in its discussion paper on [Modifying Consensus Policies](#) shared with the GNSO Council in October 2021. This was identified as a potential area for additional detail in the [Consensus Policy Implementation Framework](#), to clarify the roles, responsibilities, and procedures applicable to such cases.)

IANA Feedback on Recommendation 12:

We presume this feedback is primarily targeted to RDAP servers operated by TLD registries. IANA is not involved in the lookup.icann.org tool, but does manage the RDAP Bootstrap registry described in RFC 9224. There are also plans to implement an RDAP server for IANA-level allocations, which would include TLDs. There are potential implementation questions relating to how this requirement would manifest at that level in terms of variants at the root zone level, and ensuring that at the second-level the RDAP servers are cognizant to respond to all allocated variants at the top-level.

We note that “allocated” variant is not a definition specified in the RDAP variant specification at <https://www.rfc-editor.org/rfc/rfc9083.html#name-variant-relations> - for implementation the mapping between what is considered allocated per the policy versus what happens in RDAP should be clear to ensure interoperability.

The text of recommendation 12 addresses the response to a query, but does not discuss matching rules – should an RDAP server return a response where the query matches an unallocated variant? Consider specifying whether the server should match when given unallocated domain names – depending on the registry implementation, malicious actors could potentially register a domain with many variants, and rapidly activate and deactivate variant relations frustrating investigation efforts.

IANA Feedback on Recommendation 13:

We note Rec. 12 refers to “source” domain and Rec. 13 refers to “primary” domain. Is there a distinction to be drawn here between the two terms or should the terminology be consistent?

Generally speaking, there has not been discussion to date about how IANA should operationalize the specifics of handling first-class variants in the root zone. While the recommendation as written doesn’t seem to be generally problematic, we note that how the variant relationships are expected to be managed on a day-to-day basis likely contain a lot of implementation choices.

IANA has concerns about the comment that the “Root Zone Database does not seem to contain the most up to date information” and would like to learn more about specific examples. While there are some data quality issues relating to the lack of IANA’s ability to compel TLD data up-to-date in some circumstances, we do not know of data quality issues that would affect objective factual records on the nature that relate to this work.