

# **CDNC's comments on the IDN Variant Issues Project-Proposed Project Plan for Next Steps**

Chinese Domain Name Consortium (CDNC) applauds the work of the VIP team and its dedication on the IDN Variant issue. CDNC appreciates the VIP team's endeavor to develop solutions to variants and is willing to provide all necessary assistance. The VIP team stated in the 20 Feb 2012 proposed Variant Project Plan that "to deliver on the ambition to be able to present a decision in principle by December 2012 on whether variant TLDs can be delegated", Project 3, 5 and 6 "must be completed by November 2012". To that end, CDNC would like to take this opportunity to comment on this Project Plan.

## **Comment on Project 3: Whole-String Variants Feasibility Study**

The final Integrated Issues Report identified significant challenges with whole-string variants and will incorporate it into the feasibility study. Based on the case study team reports, CDNC observes that the whole-string variants is not important to all scripts, and would further point out that whole-string variants is fundamentally different with code-points variants. Whole-string variants issue is a semantic concept while character-based variants issue is a syntax concept. Should the VIP team deem it necessary to address the whole-string issue, the proposed study should be contained to the affected script communities and not impede the progression of implementation for code-point variants.

CDNC would also stress here that Chinese variants has no relevance with whole-string variants. In other words, the variants management mechanisms of Chinese variants have nothing to do with whole-string variants whatsoever.

## **Comment on Project 5: Examining the Technical Feasibility of Mirroring**

CDNC members have tested and verified the feasibility of parallel provisioning in addressing Chinese variants issue. Under the principle that the preferred variants label must be delegated to the same applicant/registrant, parallel provisioning has been proven adequate to handle the variants issue for ".中国/中國" to users' satisfaction. Employing registration policy and enforcement measures, vertical consistency can be ensured in variant domain names. In practice, about 17% of DNS queries for ".中国/中國" are directed at variant domain names, while around 23% DNS queries for ".台湾/台灣" are for variant forms. In the event the registrant has other sophisticated demand for Chinese domain names and their variant forms, CDNC believes this demand can be realized at the application layer without the use of mirroring technology at the root.

Based on experiences and taking into consideration the stability and simplicity of root DNS operations, CDNC believes that parallel provisioning is a feasible option to address the Chinese variant TLD delegation at the root level.

It should be noted that the parallel provisioning adopted by CDNC is not mirroring technology and thereby CDNC would like to stress here that the feasibility study on mirroring technology should not delay the study on the Chinese variant issues. Furthermore, as with the case of whole-string variants, CDNC observes that not all scripts view mirroring as essential, therefore, the proposed study should be contained to the affected script communities and not impede the progression of IDN Variant implementation for others.

### **General comments**

CDNC would like to make a fundamental observation that the variant issues across multiple languages, different language communities have different user expectations and user experiences on variant IDNs, and the different language/script communities have different levels of maturity and experience in the implementation of IDN variants. Hence CDNC reckons that a more impending and important task is that, based on the case studies and integrated VIP report, the VIP team should launch one project to establish a base IDN variant framework, which will serve as the overarching process for the consideration of IDN variants in the root zone, while allowing different language/script (or groups of languages/scripts) to proceed towards the implementation of IDN variant TLDs in a consistent and coherent manner, which ensures the maintenance of the security and stability of the root zone without disadvantaging language communities who have already significant experience or language communities that are just beginning to or have not started to consider the IDN variant issue. More specifically, the CDNC believes that the VIP integrated report along with the set of proposed projects already form a skeleton for a workable IDN variant TLD framework for the root zone, if they are setup for each language/script community to proceed through the projects separately (e.g. for Chinese, Projects 3 and 5 would not be necessary and we already have ample data for Project 6, whereas for other language communities they may need longer time to work through each project) . The VIP team should implement this one project to produce a draft IDN variant framework for the root zone before the ICANN Prague meeting and solicit community feedback and have a final framework completed for ICANN board consideration before ICANN Toronto. This would allow each of the language/script communities to then proceed through the framework in establishing its IDN Variant implementation for the root zone in parallel, with equity and without priority treatment.

Chinese variant and its management mechanisms have been discussed and verified in the community for over a decade. The advantages and disadvantages of the mechanisms have went through thorough study and carefully considered. Most importantly, the mechanisms have been fully tested and validated since the launch of Chinese IDN ccTLDs with IDN Variant ccTLDs. CDNC believes that the Chinese variant feasibility study will present a concrete and feasible solution to Chinese variant issues without compromising the security and stability of the DNS.

## **About CDNC**

Chinese domain name consortium (CDNC) was set up in Beijing in 2000 by CNNIC, TWNIC, HKNIC and MONIC. As an independent non-profit organization, CDNC is responsible for the coordination and regulation of Chinese domain name policies around the world. Since the domestic domain name plays a more important role in China, organizations and companies have increasingly shown interests and have been actively joining in the research and popularization of Chinese domain name.

CDNC will evaluate all Chinese domain name compliance with international criterion. CDNC will also establish the standards for Chinese domain name and corresponding regulation on Chinese domain name registration. In addition, CDNC coordinates the operations and management of Chinese domains in various countries or regions, communicates and collaborates with all corresponding international organizations on Chinese domain names such that CDNC is well positioned to develop international standards to meet future needs.

For more information, please visit us at: [www.cdnc.org](http://www.cdnc.org).