

To ICANN Chairman Steve Crocker and CEO Fadi Chehadé ,

The Chinese Domain Name Consortium (CDNC, [www.cdnc.org](http://www.cdnc.org)), formed in 2000, is an independent non - profit organization responsible for the technical specifications and coordination of Chinese domain names.

Collectively, CDNC has devised solutions to handle Chinese domain name variants, such as the bundling of Simplified Chinese (SC) and Traditional Chinese (TC) (“TC-SC Equivalence”) domain names—as defined by the JET in RFC 3743 (April 2004) and for the Chinese language as defined in RFC 4713 (October 2006)—and delegating both to any registrant who apply for either Simplified or Traditional Chinese domain names.

CDNC’s registration policy on handling TC-SC Equivalence is widely accepted. The CDNC IDN Table<sup>1</sup> developed by many Chinese linguistic and domain name experts over the last 10 years is currently adopted by the Chinese, Taiwanese, Hong Kong, Macau and Singaporean governments, as well as many new gTLD applicants.

The members of CDNC, such as CNNIC, TWNIC, HKIRC, SGNIC, MONIC and DotAsia, have over 13 years of experience in running Chinese domain names registration. Collectively, the members of CDNC operate more than 1 million Chinese domain names under .ASIA, .BIZ, .CN, .HK, .SG, .TW, .中国/.中國 (dot China), .台湾/.台灣 (dot Taiwan) , .香港 (dot Hong Kong) and .新加坡 (dot Singapore). 77% of active domain names under .中国/.中國 and 93 % of active domain names under .台湾/.台灣 have Chinese variants as of Jan 2013.

With over a decade of operating experience, CDNC’s TC-SC Equivalence solution is the best market-proven practice for handling Chinese variants in domain names.

CDNC would like to express its sincere appreciation to ICANN for the attention it has given to IDN over the years. Particularly, we are very pleased that ICANN has put IDN new gTLDs on a fast track to established launch.

We note that in the recent report “Examining the User Experience Implications of Active Variants TLDs”<sup>2</sup>, as high as 18.4% of DNS resolutions are queries for Chinese variants. This is evidence that Chinese users treat SC and TC as equivalent.

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<sup>1</sup> The CDNC IDN table was developed since 2000 and published in the IANA Repository in 2005, See “IDN Character Table for CNNIC”, [http://www.iana.org/domains/idn-tables/tables/cn\\_zh-cn\\_4.0.html](http://www.iana.org/domains/idn-tables/tables/cn_zh-cn_4.0.html); “IDN Character Table for TWNIC”, [http://www.iana.org/domains/idn-tables/tables/tw\\_zh-tw\\_4.0.1.html](http://www.iana.org/domains/idn-tables/tables/tw_zh-tw_4.0.1.html). In order to meet the requirement of new gTLD operation, an updated version of Chinese IDN Table has also been developed in 2012, See “ZH-CDNC IDN Table”, [http://www.cdnc.org/gb/research/file/CDNC\\_unicode.txt](http://www.cdnc.org/gb/research/file/CDNC_unicode.txt)

<sup>2</sup> See “IDN Variant TLD Program -- Draft Final Report Examining the User Experience Implications of Active Variant TLDs”, Page 16 <http://www.icann.org/en/resources/idn/variant-active-ux-18jan13-en.pdf>

Failure to implement TC-SC Equivalence for new gTLDs would result in negative user experience for 18.4% or more of the Chinese users. This would jeopardize consumer trust in new gTLDs and hence, not aligned with ICANN broader mandate to serve the public interest.

We understand and appreciate that each language has its own unique issues. Given that 70 out of 116 IDN new gTLDs are Chinese and the proven CDNC TC-SC Equivalence solution, ICANN should fast track TC-SC Equivalence for the Chinese new gTLDs.

Without causing further delay to the launch of Chinese new gTLDs , we strongly urge ICANN to complete the work on LGR (Label Generation Rules) as well as relevant delegation process for TC-SC Equivalence (e.g. update to Application Guidebook and Registry Agreement). These should be expedited and worked on in parallel.

Sincerely,

A handwritten signature in black ink, appearing to read "Dian Hualin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Prof. Hualin Qian,  
Co-Chairs of CDNC

A handwritten signature in black ink, appearing to read "Shian-Shyong Tseng". The signature is fluid and cursive, with a long horizontal stroke at the end.

Prof. Shian-Shyong Tseng  
Co-Chairs of CDNC