4, South 4th, Zhongguancun,
Haidian District, Beijing,
100190, P. R. China
July 29, 2009

Dear Mr. Chairman, Rod Beckstrom:

Chinese Domain Name Consortium (CDNC, www.cdnc.org) have been actively participating in and supporting the technical and policy development of IDN at the second and top level, including the Chinese language table, IDNA protocols, IDN guideline, EAI standards, etc. Recently our comment on New gTLD draft applicant guidebook (module 2.1.1.3.2) has been taken into policy reconsideration. Various comments were also submitted by individual members of CDNC towards the implementation plan of ccTLD fast track program in the past few years. CDNC will remain closely engaged with ICANN staff and the community to address and resolve issues associated with usage of Chinese domain names.

To help fulfill ICANN's goal of ensuring a smooth and secure launch of IDN ccTLD and gTLD in the near future, CDNC would like to recommend the ICANN community and staff to jumpstart the currently pending works on IDN guideline update. CDNC understands that latest version of IDN guideline (ver 2.2) has initiated the concept to incorporate IDN string at the top level. CDNC strongly believes that the completion of the guideline in order to provide sufficient rules and policy on implementing IDN TLD is critical for existing registries and new gTLD applicants.

We strongly urge ICANN to consider our view and firm position on two particular issues in the new IDN guideline as follows.

I. The policy of String Requirements.

The policy of requiring three or more visually distinct letters or characters is not practical for Chinese.

As a phonetic language, ideographic characters are used to express the meaning in Chinese. Most of single or two ideographic characters in Chinese can express an unabridged meaning. The writing system of Chinese employs basic building blocks that have generally accepted semantic associations, where single and two-character sequences represent concepts in their own right. The system does not remotely resemble Latin scripts so visual confusability will not be an issue. The character repertoire for these scripts is orders of magnitude larger than that of alphabetic or syllabic scripts (e.g., 71,442 Han characters in Unicode version 3.2 versus 26 English alphabets). If a string contains characters with 'Property List *[http://unicode.org/Public/UNIDATA/PropList.txt]* = Ideographic', then it is not subjected to a 3-char limitation.

It is also noted that the final report of the GNSO new TLDs Committee dated 23rd May 2007 includes a sub-group report specifically on "Single and Two Characters Labels" dated 10th

May 2007 which recommended that for Single and Two Characters IDN labels:

> "At the top level, requested strings should be analyzed on a case-by-case basis in the new gTLD process depending on the script and language used in order to determine whether the string should be granted for allocation in the DNS with particular caution applied to U-labels in Latin script…"

Members of CDNC urge that the string contention issue in the new gTLD Applicant Guidebook is subject to further specification and modification in application evaluation process and policy making. Single and two-character U-labels on the top level of a domain name should not be restricted in general.

II. The policy of handling variant characters

The implementation of IDN variant is of utmost importance to our community as variants are often used interchangeably, similar although not the same, as uppercase and lowercase characters in English.

Members of CDNC believe that the introduction of allocation of variant strings in the root zone will also avoid visual confusability and potential phishing attacks. Such policy will also ensure the security and stability of the Internet in a multi-lingual environment.

One of the other major concerns about the variant issue is technical implementation capability, for which CDNC would like to point out that the solution of IETF standard RFC3743, and more specifically to Chinese, the RFC4713 has been in practice for nearly a decade and it has been proven to be one of the most sufficient and rigorous way of managing this matter. The basic principles of RFC3743 applied are as follows:

1) **Domain name string should be bundled with a specified language:** Domain name string could be bundled with many languages, but this situation should be avoided, since the consequence of bundling with many languages could result directly with impossible registration of the domain name. Therefore a domain name string should only be recognized as legitimate one within a certain language character set. **A sufficient Variant Table of Chinese Character should be identified:** It is not in common practice for any of countries in the world to employ every character collected in the Unicode suite. Particularly none of countries has defined every single character in the Unicode suite to be the legal or official one. Therefore, validity of a domain name string should be verified with every language bundled.
2) **The variants of domain name string should be reserved:** Since in a specified language, a name usually has many variants, therefore those variants of the domain name should be reserved to protect the rights of the

holder. They are also entitled to be activated or deactivated at the request of the holder, e.g. the variants should be implemented in the root zone for resolution or transfers.

3) **The preferred variants should be all resolved:** Domain name could have many variants, but not every variant is frequently used or formally employed. Among the most frequent used ones, there may be only a small portion of the variants which should be added into the zone documents of the DNS system for resolution.
4) **The amount of variants should be constrained:** A name could have so many variants, some of which may not be meaningful at all. For instance, a name which has 10 Han characters could result 1024 (1K) variants if each of the character has one variant. Among these variants, some are meaningful, some don't make any sense at all. The resolution to all of the variants could be a huge burden to administration system. Therefore some reasonable methods should be deployed to reduce the amount of variants for better resolution and protection.
5) **Name string and its variants have a Characteristic of Atom, which needs to be dealt as a package:** Once a name and its variants are created, they are relevantly compacted together. They should be dealt with as a whole package while an individual or independent handle of any of the variants in the package is strictly forfended.

(For further information in relation to RFC3743, please refer: http://www.ietf.org/rfc/rfc3743.txt;)

These principles are believed in strongly and adhered to by the members of CDNC, which represents 99% of the Chinese domain name stakeholders. Such common issues shall be envisaged and dealt with across SOs and Constituencies in ICANN with respect to the stand of the majority of the CDN community.

We are more than happy to provide further information required, and we look forward to further discussing the above issues with you whenever is convenient to you.

Sincerely

Hualin Qian, Shian-Shyong Tseng
Co-Chairs
CC: Chris Disspain, Kurt Pritz, Tina Dam， Ram Mohan