



The Internet Corporation for Assigned Names and Numbers

25 March 2015

Mr. Andrew Sullivan
Chair, Internet Architecture Board

Re: ICANN's Comments on IAB Statement on Identifiers and Unicode 7.0.0

Dear Mr. Andrew Sullivan and members of the Internet Architecture Board:

We have reviewed the Internet Architecture Board's (IAB's) Statement on Identifiers and Unicode 7.0.0 (<https://www.iab.org/documents/correspondence-reports-documents/2015-2/iab-statement-on-identifiers-and-unicode-7-0-0/>), and we have considered how the IAB's recent findings may affect ICANN's areas of responsibility.

ICANN, as the operator of the IANA Functions, has implemented the IAB's guidance pertaining to the Unicode 7.0.0 derived tables, working with the Internet Engineering Steering Group (IESG)-designated expert for the Internationalized Domain Names for Applications (IDNA) Parameters registry.

We note the IAB's recommendation:

[. . .] Until the IETF works out how to address this potential pitfall for identifiers, the IAB recommends (as a temporary measure) that any character using hamza above another base character, in either precomposed or decomposed form, be excluded from any new identifier whenever user language information may not be available.

With respect to ICANN's mission and purpose, we are in the process of identifying areas of work that may be impacted by the issues described in the Statement. To date, all of the areas that we have identified regarding ICANN's work relate to domain names. We believe that within the Domain Name System, the identification and allocation of relevant variant sets to the same entity will address the potential issues described in the Statement.

For the top-level domains (TLDs), ICANN has reviewed the issue and notes that the root Label Generation Rules (LGR) work at this point is still under development, allowing both the Generation Panels and the Integration Panel time to take this recommendation into account and accommodate any IETF resolution reached before the expected publication of the first combined root LGR.

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Moreover, in addition to the conservative design of the LGR for TLDs, we also note that there is already a string similarity evaluation process that is designed to further guard against the forms of confusability that the Statement is concerned with as part of both ICANN's ccTLD Fast Track process and its New gTLD Program.

Similarly, ICANN is initiating the development of reference label generation rulesets for registries to use at the second level of the DNS namespace and beyond. We plan to consider the issues raised in the Statement during the development process of these rulesets.

ICANN is planning to communicate the IAB recommendations to the registries and registrars for them to consider. We note that some registries may have already addressed these issues in their policies.

Beyond these measures, ICANN plans to participate in the IETF work according to the IETF process. We look forward to further developments within the technical community to inform the evolution of ICANN's processes.

We appreciate the IAB's examination of these issues and its recommendations to the wider Internet community. We believe that the issues will be effectively addressed within ICANN's area of responsibility in the DNS through the method described above. Should you have any questions about this communication, please do not hesitate to contact me.

Sincerely,

David Conrad
Chief Technology Officer
ICANN