Monday, December 4, 2023

Subject: Universal Acceptance Issues with .BRAND Domains

Dear ICANN Board,

The Brand Registry Group seeks your attention to a pressing issue related to Universal Acceptance, and the challenges our members have faced in getting .BRAND domains to linkify[1] correctly in popular messaging apps, especially WhatsApp -- the world's most popular messaging app with over two billion users. And recent research by other new gTLD registries indicate that the problem is much bigger than that.

Linkification in Android OS

For many years now, most new gTLD registries have endured a very significant problem. When URLs containing new gTLDs were sent via WhatsApp, they were not linkifying. This issue persisted despite many of the TLDs being delegated by ICANN many years ago.

Through efforts of the .TUBE registry operator, it was discovered that the Android operating system, relied upon by many apps, contained a hard-coded list of valid TLDs that had not been updated since November 24, 2015. This meant that any TLD delegated after that date would not validate correctly, causing linkification issues beyond just WhatsApp. In fact, more than one third of the new gTLDs were not on that list, and thus would not linkify in WhatsApp, or be recognized in countless other applications.

While we applaud Android's recent update to its domain database on September 11, 2023, the problem still persists as it will take considerable time for this update to reach all Android devices. Unlike Apple, which controls both its OS and hardware, Android's updates depend on individual device manufacturers to deploy them across their product lines. This presents a lengthy timeline for resolving the issue.

Linkification in Other Platforms

Moreover, it appears that many serious issues still persist with many other major platforms. For example, the WhatsApp IOS app simply does not appear to linkify any nTLD except for .XYZ and .ONLINE, and even for those the linkification is dependent upon the version of WhatsApp being used. Apple ought to be encouraged by ICANN to update the list of TLDs that they recognize in Apple applications, and to regularly update that list in the future. We also understand that X (fka Twitter) is not linkifying .KIDS nor .MUSIC gTLDs delegated in 2021. We appreciate the .TUBE registry's diligence in compiling evidence and reference materials for ICANN and the community's consideration.[2] Despite ICANN's knowledge of this linkification problem, and despite the significant ICANN resources already allocated to deal with so-called "Universal Acceptance", almost a decade into the new TLD program, **the two operating systems used by 98% of all the telephones in the world are not UA compliant**.

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[1] To "linkify" means to convert a piece of text to a hyperlink. *See, e.g.,* Android Developers Reference: https://developer.android.com/reference/android/text/util/Linkify.
[2] https://tinyurl.com/linkificationnation

Problematic Issues, and Solutions ICANN Could Implement

The crux of the problem lies in three issues, each of which could be largely solved with only a modest amount of effort from ICANN. First, while IANA maintains a canonical list of TLDs, there is no RFC nor any guidance from ICANN as to clear best practices for the use of such a list in software applications. As the guardian of the DNS, ICANN first should establish and publish guidance for the developer community to refer to IANA's list, and emphasize that it is updated from time to time as new TLDs are delegated. In particular, ICANN should encourage the developer community to periodically refer to the list and update their applications so that all ICANN-delegated TLDs are recognized and linkified correctly -- without the need for additional prefixes like "http://" or "www." Longer term, ICANN should work to promote an RFC that incorporates this guidance. The current situation provides an unfair competitive advantage to older TLDs, at the expense of newer TLDs including most .Brand TLDs -- which is directly contrary to ICANN's mandate to promote fair competition among TLD registry operators.

The second issue is the complete disconnect between ICANN and the developer community. In a utopian world, there would be a place for developers within ICANN's MSM, like a "software developer stakeholder group", however the current ICANN multi-stakeholder model has no specific place for developers. At minimum, ICANN could expend modest resources to specifically target the software development community with outreach, encouraging them to engage in ICANN policymaking within the Business Constituency or otherwise. Longer term, ICANN could consider and encourage a specific constituency for software developers within the GNSO, because that community is so critical to the DNS, and vice versa. We encourage ICANN not only to foment a presence at developer conferences, but also to publicly recognize and award individual programmers or companies that make their software UA compliant.

The third issue is the Universal Acceptance Steering Group (UASG). Unfortunately, that group's focus has been predominantly on encouraging facilitation of Internationalized Domain Names (IDNs), which represent only a very small percentage of registered domain names. It is crucial to allocate substantial resources and attention at least equally to ASCII domains, which are used by over 95% of internet users. A more balanced approach or even separate groups for ASCII and IDN domains may be necessary. ICANN must focus on facilitating adoption of domain names already registered and in use, rather than on IDNs which only have a hope of being more widely used in the future.

Conclusion

In conclusion, we urge ICANN to take a proactive role in resolving critical and ongoing Universal Acceptance issues such as the linkification issue that .Brand TLDs have struggled with. Establishing and providing clear guidelines for developers, addressing the divide between ICANN and the developer community, and a creating a balanced approach between ASCII and IDN domains all would be important steps in the right direction. We believe that Universal Acceptance should address the critical issues facing ASCII domains and engage deeply with the developers and programmers who are the ones that can actually make "Universal Acceptance" a reality. ICANN needs to assure that existing TLDs will function as consumers have come to expect from older TLDs. Pursuant to its Bylaws mandate, ICANN

must work to ensure that all existing TLDs are treated with fairness and equality, and that is clearly not the case today.

We appreciate your attention to this matter. We hope that ICANN will take the necessary steps to ensure the universality and acceptance of <u>all</u> ICANN-delegated domain names, regardless of the date of delegation of the TLD, or the TLD's character set.

Sincerely,

Crews Gore

President, Brand Registry Group