ICANN Recommendations of Public Comments Received on the

Review of the IDN ccTLD Fast Track Process

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1. Background

Per the Final Implementation Plan for IDN ccTLD Fast Track Process, approved by the ICANN Board at its annual meeting in Seoul, Republic of Korea on 30 October 2009 (http://www.icann.org/en/minutes/resolutions-30oct09-en.htm#2), the ICANN Board directed staff to "monitor the operation of the IDN ccTLD Fast Track process at regular intervals to ensure its smooth operation, and, subject to Board review, update the process when new technology or policies become available, with the goal to efficiently meet the needs of Fast Track process requesters, and to best meet the needs of the global Internet community."

On 22 October 2010, ICANN announced its first review of the IDN ccTLD Fast Track Process.

A public comment period ran from 22 October to 17 December 2010 and was subsequently extended to 31 January 2011 at community request. The archive of public comments can be found at: http://forum.icann.org/lists/fast-track-review-2010/.

A public session was held during the ICANN meeting in Cartagena on 6 December 2010 to further discuss how well the process was functioning for the community. Information about this session can be found at: http://cartagena39.icann.org/node/15415.

2. Summary of Comments

ICANN received input on the IDN ccTLD Fast Track Review from individual Internet users, the DNS technical community, APRALO, the Hong Kong Internet Registration Corporation (HKIRC) and the Country Code Names Supporting Organization (ccNSO). An analysis of these comments along with ICANN recommendations is provided below.

Main Themes

1. A large number of comments were received from individuals and entities in the Bulgarian Internet community, asking that ICANN re-evaluate the Bulgarian IDN ccTLD request for .bg in Cyrillic. Many questioned the transparency of the decision that found the applied for Bulgarian string was too similar to .br. Several commenters proposed that the requested string is not confusable with ".br." The commenters further proposed that because the proposed string is not confusable with .br, the applied-for string should be accepted by ICANN within the Fast Track Process. Alternatively, the Country Code Names Supporting Organization (ccNSO) stated that disputes and objection/re-evaluation are policy issues that should not be addressed through an amendment to the Fast Track Process.

2. The ccNSO, APRALO, HKIRC and Jothan Frakes commended the successful launch of the Fast Track process. The ccNSO and HKIRC noted that the transparency in the process was appropriate and maintaining confidentiality during string evaluation allows requesting countries and territories to resolve issues of public authority and community-support without undue politicization of the process.

3. Several members of the DNS technical community noted issues with the treatment of IDN tables. One comment suggested that it was time for ICANN to stop publishing the IANA

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Repository. Several noted that this inserts ICANN into registry naming policy. The ccNSO stated that this was a policy issue not appropriately addressed in ICANN implementation processes. One comment stated that ICANN should not engage in or actively foster the management of IDN tables.

4. Several commenters noted that the Fast Track was intended to be for clear cases and non-controversial requests. If the Fast Track process is to continue, issues with confusable strings as mentioned in the comments, will continue to arise.

5. Several commenters raised the issue of variants.

The comment forum can be viewed at http://forum.icann.org/lists/fast-track-review-2010/.

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3. Analysis and ICANN Recommendations

To facilitate the review process, the review process suggested eight topics of discussion covering different aspects of the policies in place for the IDN ccTLD Fast Track program. Topics included: transparency, community support, meaningfulness, determination of the IDN ccTLD manager, IDN tables, disputes, confusingly similar string and objection/re-evaluation rights. A short explanation of each of the topics was included in the announcement that accompanied the public comment period. The following is an analysis of the comments on each of the proposed topics along with ICANN recommendations. Each topic begins with the description included in Fast Track Review announcement document, please see:
http://www.icann.org/en/announcements/announcement-2-22oct10-en.htm.

The included recommendations should be considered as initial feedback to the community. All received comments and suggestion for changes to the Fast Track Process will be provided to the ICANN Board for its consideration and decision. The feedback is provided for transparency, and will be included in the advice presented to the Board for consideration when making any decisions on the outcomes of the review of the Fast Track Process.

Transparency

On the subject of transparency of the Fast Track Process, the topic was introduced as follows:

The published [Fast Track] policy document states that requests are only published when they have successfully passed through the String Evaluation portion of the process. Before then ICANN publishes only the total number of received requests, the status the requests are in and the corresponding number of languages. In this published material there is no information regarding the countries and territories requesting the TLD, nor any details of the requests' contents.

> a. *This is very useful from the perspective that in some cases the requester wishes to keep the request confidential, and in other cases ICANN has received requests that are not valid and do not fulfill the established requirements.*
> b. *To a certain extent, the process is not completely open and transparent. A lot of end-user inquiries have been received about which countries and territories ICANN has received requests from, which we have not been able to adequately respond to. Further, in comparison, the gTLD process will publish received requests (minus selected confidential information) after the administrative review that takes place immediately after the close of an application round.*

Comments and ICANN Recommendations:

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Affiliation	Comment	ICANN Recommendation
Members of Bulgarian Internet community	23 of the 36 total comments received were from members of the Bulgarian Internet community. Most comments questioned the transparency of the process. The comments included statements such as: "whenever procedures are not public, there are views that not everything in them is correct." -and- "the DNS panel's criteria, used to evaluate the domains should be made public. Now, with all this anonymity, people in Bulgaria believe that the panel didn't review carefully the request, and didn't explore all options." Commenters noted that the Bulgarian community did not see the grounds behind the rejection of the string by the DNS Stability Panel.	A detailed description of the rules followed in determining whether an applied-for string is confusingly similar to existing TLDs, potential future IDN ccTLDs, or other-wise applied-for TLDs, is described at: http://blog.icann.org/2010/03/clearing-the-confusion-fast-track/ These details were previously released in response to community inquiries for this information. As additional TLDs in various scripts are being applied for and/or approved for delegation, the rules under which string confusability is established will be re-examined for future applicability. While specific proposals regarding the string confusability requirements are put forward in the comments as applicable to specific applications and scripts, ICANN recommends that the subject matter is of high importance, and should take multiple scripts into consideration in order to be useful for the process. Further, the rules around string-confusability must coexist with the gTLD Program. As a result, ICANN recommends additional discussion on the broader subject, and an initial session to accommodate this has been scheduled for the ICANN Silicon Valley meeting in San Francisco, March 2011.
ccNSO	The ccNSO appreciates and supports the need for appropriate levels of transparency in the Fast Track process. Maintaining confidentiality during string evaluation allows requesting countries	ICANN also notes that this was the reason behind the initial confidentiality requirement during string evaluation. ICANN recommends no changes to the Fast

	and territories to resolve issues of public authority and community-support without undue politicization of the process.	Track Process on the basis of this comment.
APRALO	The transparency of the evaluation process for IDN ccTLD applications should be enhanced. "Applied for strings should be announced earlier in the process and string evaluation reports should be made public."	As noted above, the discussion of transparency during the development of the process resulted in the inclusion of confidentiality during the string evaluation phase. ICANN does not recommend that the APRALO's call for reduced confidentiality overrides the benefits of maintaining confidentiality (as cited by the ccNSO and identified in the creation of the Fast Track Process) afforded to applicants. ICANN does not recommend any changes to the Fast Track Process on the basis of this comment. However, this concern could be addressed in further discussion and policy development with the ccNSO. On the subject of releasing the string evaluation reports, this has also been under discussion. However, due to the confidentiality requirements of the Fast Track Process, ICANN does not publish the reports. It is up to each individual requester to determine whether or not it will share its application information or evaluation report more broadly. The confidentiality requirement only binds ICANN. It is recommended that ICANN continue to only share these reports with the requester.
HKIRC	The "current arrangement where requests are only published when they have successfully passed through the	See above. No changes to the Fast Track Process are recommended on the basis of this comment.

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	String Evaluation stage as appropriate." Suggest that clarification be added to clearly reflect the differences in community support for the string in the string evaluation step, as separate from the required demonstration of community support for the IDN ccTLD manager in the IANA delegation stage. This clarification should be made for ease of preparation for future applicants.	ICANN has already implemented modifications to requestor communication on the community support topic, and in this way enhanced the information made available about this distinction. The enhanced communication is a clarification and introduces no changes to the process.

Community Support

On the subject of the community support requirement in the Fast Track Process, the topic was introduced as follows:

The policy document requires demonstration of Internet community support for the applied-for TLD string. The notion of community support and the requirement for documenting such has been a topic of discussion since the launch of the process. While examples and descriptions of what this support could entail, the Final Implementation Plan does not specify exactly the amount or detail of how one can demonstrate community support. The policy reason behind this is that the approach is different depending on geographic location, culture, and other developments in the respective countries and territories. All such different approaches are valid and appropriate to the Fast Track Process.

The following issues have been raised, that may be appropriate for discussion in this review:

- *Some do not agree with the need for community support documentation and do not understand the difference between the type of support for the string (to be established in the String Evaluation) and the type of the support for the ccTLD manager (to be established in the Delegation evaluation).*
- *Some do not find it necessary to demonstrate community support for the string nor the manager. The reason being that such decisions can be made by government entities, and the need for support undermines the authority of the government in the country or territory.*

Comments and ICANN Recommendations:

Affiliation	Comment	ICANN Recommendation
ccNSO	The community support elements are relevant elements of the Fast Track process, though will not necessarily	The ccNSO comment is reflective of concerns that arose during the first year of the Fast Track process. To address

	be fulfilled in the same way by all requesters. Some requesters noted the need to know more clearly how to demonstrate community support.	these concerns, ICANN has already modified how it communicates with requesters regarding demonstrating community support within the string evaluation phase. Early in the implementation of the Fast Track, ICANN produced a blog entry providing some further explanation of the community support requirement, available at http://blog.icann.org/2010/02/community-support-for-idn-cctlds/. This is a clarification of the implementation of the Fast Track, and no changes are recommended to the Fast Track process in order to continue providing clarification to requesters and the community on this issue.
HKIRC	The existing steps are found to be reasonable and necessary.	See above. No changes recommended are recommended to address this topic.
Nikola Marinov	More guidelines on who is treated as a part of the local community should be included in the Fast Track.	See previous comment that additional examples and information is being provided to requesting countries and territories as clarification.

Meaningfulness

On the subject of the meaningfulness requirement in the Fast Track Process, the topic was introduced as follows:

The strings requested through the Fast Track Process must be demonstrated to be meaningful representations of the corresponding country or territory name. If the strings requested do not automatically fulfill this requirement through a published authoritative list, the requester must include documentation from a linguistic expert that the strings are in fact meaningful representations of the country or territory name. Some requesters have stated that this requirement is not necessary in cases where the strings requested are agreed to by the government and otherwise seem obviously meaningful.

The issue has been raised that in some cases, the strings requested do not fulfill the meaningfulness automatically. Staff is looking especially for feedback as to whether additional elements could result in automatically fulfilling this requirement, and if so, which.

Comments and ICANN Recommendations:

While no comments were received during the review on meaningfulness, ICANN notes that the linguistic support provided by the UN Group of Experts on Geographic Names (UNGEGN) has been a very useful resource for requesting countries and territories.

Determination of the IDN ccTLD Manager

On the subject of the determination of the IDN ccTLD manager in the Fast Track Process, ICANN introduced the topic as follows:

This is a topic related to the community support topic discussed above and is primarily raised here for clarification purposes.

In many cases the IDN ccTLD manager is the manager that submits the original IDN ccTLD request. However, this is not a requirement. But it results in confusion in some cases because the IDN ccTLD manager is not "evaluated" in the String Evaluation, but only subsequently in the String Delegation.

Clarifications in the long term will be beneficial on this subject (we are also trying to make this more clearly in the information provided participants in the Fast Track Process).

Comments and ICANN Recommendations:

No comments received.

IDN Tables

On the subject of IDN Tables in the Fast Track Process, the topic was introduced as follows:

Historically the content of IDN Tables has not been evaluated and approved in any way or form by ICANN. This includes the IDN tables provided in the Fast Track Process. Staff does review the received tables in very limited capacity and only in relation to for example potential/obvious errors and to what extent the tables fulfill the requirements of the IDN Guidelines.

However there has been a discussion in the community that requesters should simply send in or refer to other IDN tables (that have already "passed through" the system) and in that way their lack of a table will not delay the processing of the IDN ccTLD request. Such behavior opens the discussion of whether there should be better or other types of checks in place to review the received IDN tables.

The responsibility of serving the community in the best possible way (and most secure way) by having measures in place with these IDN tables, including sufficient variant identification and registration rules, which is intended to avoid user confusion as much as possible is a responsibility primarily of the TLD registry. The question is, as we open up for more IDNs and IDNs generally at the top level, if additional rules should be in place.

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Comments and ICANN Recommendations:

Affiliation	Comment	ICANN Recommendation
John Klensin	Stated that "it is perhaps useful to think about that model as relatively more about transparency of registry requirements than as about normative decisions that should affect or bind other registries or represent broadly authoritative statements about languages, writing systems, or script usage." Management of language tables is not an activity ICANN should engage or actively try to foster.	ICANN agrees. No changes are recommended immediately to the Fast Track Process. It is recommended that the role and effect of IDN tables be discussed during the Variant Management project and also be introduced for consideration in the ccNSO PDP. If those forums are unable to progress the work, a separate working group will be formed. Meanwhile, in the Fast Track Process, ICANN will continue to ensure that IDN tables are provided by each applicant and follow the administrative rules in the IDN Tables Repository. In addition, submitted table will continue to be reviewed to check if a table contains invalid characters, or otherwise appears to generate problems in relation to the IDNA protocol or IDN Guidelines.
ccNSO	The ccNSO believes the issue of IDN table assessment is a policy issue not appropriately addressed during ICANN staff implementation processes.	See above. No changes recommended at this time.
HKIRC	Welcomed discussion on the need for additional rules concerning IDN tables, but "it would be an overambitious task for a central body like ICANN to evaluate and approve the IDN tables…ICANN should bear in mind its genuine limitation on handling the issue."	ICANN agrees, see recommendation above to consider the issue as part of the Variant management discussion and in the ccNSO PDP. ICANN notes that consistency must exist

		between the IDN Tables Repository, the Fast Track Process, and the new gTLD Program requirements. No immediate changes are recommended to the Fast Track Program based on this comment.
Xiaodong Lee	Raised a question about the accuracy of IDN tables, and suggested that perhaps an evaluation panel be formed to improve the IANA table (repository). Noted that a registry that uses a table wrong will cause security issues, such as phishing.	Agreed, see above recommendation. ICANN further notes the security issue raised here, and that there are not a lot of educational materials in existence at the moment on this subject. ICANN recommends initiating a project to make such educational information available. The information should be developed with assistance from experts in the community. No changes are recommended to the Fast Track process to address this comment.
Ram Mohan	Stated that it is time for ICANN to stop trying to publish this IANA Repository of IDN Tables. This does not scale, and by publishing the tables in a repository ICANN takes on other responsibilities. Caution against doing a limited staff review and feedback in the case of Security issues. If there is some limited review, it may not be sufficient to catch a table that crosses multiple scripts or includes problems that are not obvious.	ICANN notes that at the moment IANA maintains a collection of "IDN tables" in what is known as the IDN Practices Repository. Per the IDN Guidelines, IDN ccTLD managers, and IDN capable gTLD registries submit their IDN Tables to the IANA Functions Department for publication in the IDN Practices Repository. This service is provided by ICANN solely for informational sharing purposes. As the suggested change would affect other processes than the Fast Track Process, ICANN does

		not recommend the proposed change to take effect in the Fast Track Review. Instead, please see above for ICANN recommendation regarding review and security issues. As a result no ICANN recommended changes.
Harald Alvestrand	Stated that ICANN should review submitted tables for correctness. ICANN should consider whether it could publish or cause to be found linguistic commentary on IDN tables. ICANN should support requesters who reuse an existing table rather than create their own.	Noted. Coordination with colleagues in the IANA Functions Department may provide better display of the IDN Tables to facilitate support of reuse. No changes to the Fast Track process are recommended to address this portion of the comment. In addition, communication with requesters on the subject of re-use will be enhanced in the Fast Track Process. ICANN considers this clarification and not a change to the process.
Jaap Akkerhuis	Stated if ICANN is going to evaluate tables, it's directly getting involved into registry naming policy and it's something that [ICANN] we should be aware of.	Noted, see above.
Mohammed El Bashir	Arabic was an example where registries had loaded Arabic language tables to the IANA Repository when Arabic was not their primary language and this created issues. A linguistic panel charged with reviewing IDN tables could address this problem.	Noted, see above.
Nikola Marinov	Stated that "IDN tables should be reviewed and checked for letters that are not a part of the official country alphabet."	Noted, see above.

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Volodya	Stated that "the Fast Track has created a slightly higher ambiguity on domain…a suggestion would be to set up equivalency tables, which would automatically register the domain in both local and Latin script where possible."	This comment is not fully understood by ICANN. As a result ICANN will follow-up within the recommended ongoing discussion mentioned above.

Confusingly Similar String

On the subject of confusingly similar strings in the Fast Track Process, the topic was introduced as follows:

Some issues have arisen out of requested strings that are confusingly similar to existing strings and/or other requested-strings. The confusability is determined by the DNS Stability Panel, which works well, although there is some cases has been demonstrated different opinions on whether a string is confusingly similar or not. Staff believes that the DNS Stability Panel working guidelines are adequate as they supply a careful approach to what strings are approved as TLDs, especially due to the limited nature of the Fast Track Process. Nonetheless this has been raised as a topic of discussion.

Comments and ICANN Recommendations:

Affiliation	Comment	ICANN Recommendation
John Klensin	Stated that "as the number of approved and delegated domains increases, comparisons with all such domains will inevitably become both more complicated and more subjective: for example, it is worth remembering that almost every script has characters that consist exclusively of vertical, horizontal, or slanted lines: not having such characters would be an archaeological surprise." and "If the Fast Track process is to continue for an extended period, unless the evaluation process has additional clear advice from the community that lead to consistent rules about how to handle these cases, disagreements are almost inevitable."	Agreed, see discussion in the Transparency section about a planned session for the ICANN Silicon Valley meeting in San Francisco to garner input from the community on this topic.
ccNSO	Concurs with the view of staff that no additional measures or guidelines are needed.	Noted. See above. No immediate changes are recommended but ICANN is planning to engage the community

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		in further discussions on the issues of string confusability.
HKIRC	Considers the existing mechanism to be effective and sound.	Noted. But see above. As ICANN and hence applicants and the eventual users do run into problems in this subject, more discussion is recommended.
Stoyan Danev	Stated "the whole Bulgarian community supports the proposed [Bulgarian IDN ccTLD] string, a lot of international experts agreed there is no similarity between the string and any other existing domains." Provided a link to a confusability tool provided by the Unicode Consortium, which shows the Bulgarian string as similar to "6r" rather than "br." (see http://unicode.org/cldr/utility/confusables.jsp?a=6r&r=IDNA2008).	Noted, while it is not possible for ICANN to comment on a specific example, see above for recommended action for further discussions on the topic of string confusability.
George Todoroff	Provided a very detailed analysis of the similarities between .бг and .br, using the Unicode Technical Standard #39 confusables document. Stated that the applied string .бг "could be confused only with the string .6r, which does not exist" and inquired as to how this situation was different from the string for the Russian Federation, which was approved by ICANN although it had one character confusable with a Latin character. Alek Lynge and Nikolay Popov supported this comment.	Noted, while it is not possible for ICANN to comment on a specific example, see above for recommended action items and link to a clarification on how the confusability is assessed.

Disputes, Objection and Re-Evaluation:

On the subject of disputes, objection and re-evaluation in the Fast Track Process, the topic was introduced as follows:

No controversial strings have been considered at this stage. As such, no disputes between requesters from different territories and countries have been experienced. Disputes between requesters from the same country or territory needing to deal with and decide locally which requests proceeds seems to be working adequately at this stage. The approach to date is that

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there needs to be agreement within a country or territory before a fast Track request can be processed.

It might be useful to have a discussion about what action, if any, ICANN should take in situation where one part of a government or relevant public authority provides the necessary support documentation for an IDN ccTLD request, but another part of the same government or public authority states an opinion which could be considered opposite. This situation could occur during String Evaluation, String Delegation or post delegation

It has been noted by the community that there are no re-evaluation or objection mechanism for declined IDN ccTLD requests. The primary reason for this is that the Fast Track Process is considered an interim process, short-termed for those countries and territories where there is no controversy with implementing IDN ccTLDs. As such if there are any disputes or issues coming up through the evaluation, such should be referred to the coming long-term process for IDN ccTLDs. The long-term process is currently in the policy developed phase in the ccNSO. Question is if the Fast Track Process should be expanded to include such options, or if it should stay in its limited capacity.

Comments and ICANN Recommendations:

Affiliation	Comment	ICANN Recommendation
HKIRC	Noted that the Fast Track was intended for non-controversial requests, and that the process cannot handle, nor was it designed to handle controversies and disputes in applications. Stated that the mechanism for dispute resolution should be studied and tailored in the [ccNSO] policy development process for the introduction of IDN ccTLDs.	Noted. No change in the current Fast Track process is recommended.
ccNSO	The ccNSO states that the treatment of disputes is a "policy issue and should not be addressed through an amendment of existing implementation rules and procedures."	Noted. No change in the current Fast Track process is recommended.
	The ccNSO "believes that an expansion of the Fast Track process to include objection or re-evaluation rights is a fundamental change in the Fast Track process and should not be addressed	Noted. No change in the current Fast Track process is recommended.

	through an amendment to the existing implementation rules and procedures… Including such an option at the string evaluation stage would increase the risk of undue politicization of the process…and could also jeopardize the independence of the external reviewers." The ccNSO notes that to the extent disputes or issues are the result of ICANN (staff) decisions, the current, established processes for reconsideration and independent review of ICANN actions are applicable and available.	
Bulgarian Internet Community	23 of the 36 comments that ICANN received in the Fast Track Review were received from the Bulgarian Internet community. Most of the comments requested that ICANN provide a mechanism for appeal or re-evaluation of Bulgaria's request for .бг in Cyrillic.	Noted. As this subject is under policy discussion in the ccNSO and since the intent with the Fast Track Process remains limited and to those applications where no disputes or issues exists, ICANN recommends no changes.
Nayden Filipov	Questioned why the Fast Track process did not state that the Bulgarian government could have appealed through the reconsideration process or the independent review process. Nayden asked that the Board review the Fast Track and introduce the possibility of an appeal procedure.	The Reconsideration Process could be applicable to any ICANN staff or Board action, and the Independent Review process could be applicable for any Board action, assuming the Bylaws requirements are met to allow for either review mechanism to be implemented. Therefore there is no need to identify the specific availability of the Reconsideration processes or other ICANN review mechanisms (see http://www.icann.org/en/general/accountability_review.html and the ICANN Bylaws for more information) within any individual ICANN initiative such as the Fast Track documentation. Please also see ICANN recommendations to related comments.
Pencho	"Please revise the fast track application process and allow Bulgaria to apply	ICANN cannot comment on a specific application in the Fast Track

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Petrov	again and get the domain."	process. But in general, please note there is no built-in re-evaluation option in the Fast Track Process, and please see above for ICANN recommendations on related comments.
Association UNINET	Stated that they were "the first group in Bulgaria that started public discussions about an IDN ccTLD back in in 2006." During four years of public consultation, polls and surveys indicate that the Bulgarian Internet community would only accept the .бг (bg) string and would vote against any other. UNINET noted there was not a mechanism to challenge the DNS Stability Panel result in the Fast Track process. UNINET suggested the best way forward would be for Bulgaria to reapply in a modified fast track process, with a more open evaluation, "so all interested parties would be able to submit comments and proposals."	ICANN supports the community outreach and deliberations for countries and territories to determine which string would best serve the country or territory as an IDN ccTLD. However, ICANN also notes that in 2006, there were no requirements in place for the IDN ccTLD Fast Track Process. As such the community may not have received the necessary information to make their decision.

ICANN cannot comment on a specific application in the Fast Track process and notes that it is unfortunate if no other string would satisfy the Bulgarian internet community; however, as the Fast Track process is a limited initial introduction of IDN ccTLDs strict rules exists to ensure the safety of existing TLDs and users thereof. ICANN recommends no changes. |
| Mira Doikova, on behalf of Bulgarian Netizens Group | "I support the re-evaluation for Bulgaria." | As stated above, the Fast Track Process has no re-evaluation process. Please see above for additional feedback. |
| Stoyan Danev | Submitted two comments, both strongly supporting re-evaluation of the Bulgarian IDN ccTLD request. He noted that two Facebook groups support the Bulgarian IDN ccTLD string, one group had 118 members (as of 17 Dec 2010), and | Note. Please see above for feedback. |

	another had 968 members. He also provided links to a joint statement of 4 major Bulgarian IT Associations – the Bulgarian Web Association, the Bulgarian Association of Information Technologies, Bulgaria ICT Center and the association of development companies BASSCOM – all requesting re-evaluation.	
Petar Mehmedov	Asked that ICANN reconsider the Bulgarian request and add the ability to reassess rejected applications. This comment was also echoed by Ivan Stoyankov, Petko Kolev, Nikola Marinov, Alex Nikolova, Alek Lynge, and Daniel Asparuhoff.	Noted. See above for feedback.
Kalina Uzunova	Noted that since the rejection of the Bulgarian IDN ccTLD Fast Track request, "the idea of a Bulgarian Cyrillic domain has suffered severely." She asked that the ICANN Board reconsider and allow Bulgaria to reapply with the same proposal. "There are sufficient measures to prevent occurring of even one case of confusion."	Noted. See above for feedback.
Krum Jonev	Suggested that two rules be applied in the re-evaluation [on the Bulgarian IDN]: "1. All names in the .бг (.bg) idn cctld must be registered only with Cyrillic letters. 2. All names in the .бг (.bg) idn ccltd must contain at least one letter, which can be visually distinguished from the Latin alphabet (one of the letters: б, г, д, ж, и, й, л, п, ф, ц, ч, ш, щ, ъ, ь, ю, я)."	Noted. See above for recommendations to generally revisit the subject matter of string confusability across multiple scripts vs a single script. ICANN further notes that the proposed changes/rules would not be possible for ICANN to impose on a ccTLD manager per the relationship between ICANN and IDN ccTLD managers today. Such registration policies are set by the IDN ccTLD manager with input from their community.

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Other Topics:

Other topics on which comments were provided in the Fast Track Process Review:

Comments and ICANN Recommendations:

Affiliation	Comment	ICANN Recommendation
John Klensin	*Script families:* Klensin provided examples of script families that should be considered more carefully in the Fast Track. Examples included Chinese-Japanese-Korean, Greek-Latin-Cyrillic, Western Arabic and Eastern Arabic (including Persian and Urdu).	Noted.
Eric Brunner-Williams	The Fast Track process is broken because the one script per presumption, and the presumption that only non-Latin scripts apply in the Fast Track, was made a rule in the Fast Track without sufficient reflection. "decorated Latin" has been excluded by the IDN ccTLD Fast Track, and "has the effect of limiting the benefit of IDN ccTLDs to the majority of populations in East Asian, Eastern European, West Asian and North African states, and utterly denying it to the pluralities of populations of the Americas who do not ordinarily use a Latin language, but who do ordinarily use a Latin script, with extensions."	Noted. This is however a limitation in the Fast Track Process because the subject matter needed further policy discussion. Such is ongoing in the ccNSO and as a result ICANN does not recommend immediate changes to the Fast Track Process.
John Klensin	Noted that the exclusion of extended Latin may have once been reasonable but was now "becoming a significant bar to equitable and balanced internationalization of the DNS." Permitting extended Latin will raise confusability issues and	Noted, see above.

	that a model for handling this should be developed before Latin-character strings are added rather than on a case-by-case basis.	
John Klensin	*Application quality*: Stated that with the "increase in the number of non-ASCII domain names, the potential for confusion by people not familiar with the relevant scripts will rise."…ICANN may need to provide improved tools and/or tutorials to permit creating and verifying conforming applications or may need clear and transparent rules about the degree to which staff are permitted or encouraged to help perfect applications…Applications that are incomplete or inadequate in any way should be returned to the applicant for updating."	Noted. The purposeful limitations of the Fast Track Process mitigate the risk of this confusion occurring and therefore no changes to the Fast Track process are recommended to accommodate the remaining IDN ccTLD applicants. ICANN will and does assist applicants, per the Staff Support Function as detailed in the Final Implementation Plan. The Fast Track is limited in scope. As the ccNSO PDP is completed, rules for ICANN-requestor communications and formal tools for verifying requests for completeness may be developed. The Fast Track experiences will inform the development of these processes and tools. Even in the Fast Track process, incomplete requests are turned back. As a result, the applicant can make changes in writing or submit an entirely new application. At this time, ICANN is accepting written modification inquiries. ICANN recommends no changes.
John Klensin	*Variants:* noted the confusion in the community and Fast Track regarding the term "variant". Recommended 1) that ICANN stop talking about variants unless ICANN is prepared to supply one or more clear and concise definitions. 2) If requesters are able to continue submitting variants, then ICANN should require that they explain their relationships and explicitly indicate which form they are requesting be immediately delegated , which form they are hoping to be delegated eventually, and which form they are merely	ICANN has already initiated a major project to evaluate the Variant Management issue. This includes launching a Board directed project to identify and study the issues of delegating IDN variant TLDs in the DNS Root Zone. The plan proposes composing teams of community experts in linguistics, DNS, registry operations, policy and security and stability. A session on this proposed plan is planned for the ICANN Silicon Valley meeting in San Francisco and community participation is appreciated.

	trying to have reserved forever. 3) applicants requesting delegation of variants be required to explicitly indicate whether they are looking for aliases/synonyms with a single delegation tree or whether they are looking for multiple delegation trees that they intend to manage in a linked way. Finally, noted that ICANN should make it very clear to all concerned that delegation of variants only after all of the relevant technical issues have been resolved is likely to be equivalent to "never" and that short-term plans should not be made on that basis.	
Eric Brunner-Williams	The treatment of variants has led to an "inability to express usefully what is meant by equivalences of variants," and limiting the Fast Track process to states has the effect of limiting minority languages from participating in the process.	Noted. Please see above discussions on scope of Fast Track program and the proposed variant management project.
John Klensin	*Duration:* noted that the Fast Track was intended to be an interim mechanism to cover cases that were presumably easy. Recommend shutting down the Fast Track and replacing it with a permanent mechanism better equipped to handle more complex cases.	Noted. The interim nature of the Fast Track was always and still is the intent for the process. The expectation is that the Fast Track Process would run for a minimum of 2 years and/or until the ccNSO has finished its policy deliberations for a 'long-term' and more permanent process for IDN ccTLDs.
Jothan Frakes	Provided a suggestion for including in the Fast Track a mechanism for new IDN ccTLD operators to receive a checklist that indicates some of the global resources that can be notified about the coming	Noted. ICANN will explore potential ways to provide such a mechanism.

	availability of their IDN ccTLD, such as the Mozilla Foundation.	
APRALO	Suggested that where the operator of an IDN ccTLD is the same as that for a corresponding ASCII ccTLD, the IANA Whois record should reflect this situation more appropriately.	Noted. This feedback will be provided to the IANA Functions Department for their input on the technical feasibility of this suggestion.
Hong Xue	Questioned whether the DNS Stability Panel, on which ICANN relied in rejecting a requested string, was not subject to the pre-existing reconsideration or independent review processes.	The ICANN Bylaws set out the requirements for requesting Reconsideration (Article IV, Section 2) or initiating the Independent Review Process (Article IV, Section 3). Additional information on ICANN's accountability mechanisms is available at http://www.icann.org/en/general/accountability_review.html.
Stoyan Danev	Stated that "the Bulgarian community has clearly demonstrated that selecting another string is unacceptable and if the proposed one is not approved, Bulgaria will remain WITHOUT an IDN ccTLD. This is really against the ICANN policy of making the Internet accessible to everyone."	Please see more discussions above. Also, note that the Fast Track Process is limited in nature until a more permanent and expanded process becomes available. As a result the Fast Track Process does not yet include eligibility to apply for an IDN ccTLD in all scripts and in all cases at this time. For example, Latin strings, similar strings and variant strings are not permitted at this time. While this is an unfortunate reality, proceeding with the limited Fast Track launch allows those countries and territories where no disputes or issues existed regarding their proposed strings to move forward. At the same time a process intended for a broader audience is being built in the ccNSO.
Kristian Hristov	Disappointment with the result for Bulgaria, and that it would be unreasonable for Bulgaria to have to choose a different string from the Cyrillic version of .bg. This view was echoed by Ludmil Minkov, who also suggested that "a more in	ICANN cannot comment on a specific request but recognizes the issue in general and has engaged in activities with others in the community to help find solutions. One example is the ongoing work with UNESCO to support its efforts to provide member states with help by creating a reference table of IDN ccTLD Cyrillic

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	depth study and understanding of the Cyrillic script will help ICANN to see the big difference between" Latin and Cyrillic characters. Viktor Boyadjiev stated, "if Bulgaria is obliged to choose a new TLD, it wont get any community support."	country names/abbreviations.
Ivo Genov	Stated that "ICANN should make a little effort to be able to get out of the situation with the Bulgarian candidature with a favorable solution for all parties…People are frustrated that their so long awaited domain remains a mirage and begin to start suggestions that all Bulgarians must give up the domain in Cyrillic or create a local version of it."	ICANN is committed to supporting internationalized domain names. One example of our commitment is the ongoing work with UNESCO. Please see response in above two comments

Comments Received (in Comment Forum)

Below is a link to each comment reference in the above analysis:

APRALO - http://forum.icann.org/lists/fast-track-review-2010/msg00029.html

Hong Kong Internet Registration Corporation Ltd - http://forum.icann.org/lists/fast-track-review-2010/msg00027.html

Country Code Names Supporting Organization (2 comments) - http://forum.icann.org/lists/fast-track-review-2010/msg00025.html and http://forum.icann.org/lists/fast-track-review-2010/msg00015.html

John C Klensin - http://forum.icann.org/lists/fast-track-review-2010/msg00022.html

Eric Brunner-Williams (2 comments) - http://forum.icann.org/lists/fast-track-review-2010/msg00018.html and http://forum.icann.org/lists/fast-track-review-2010/msg00017.html

Ivo Genov - http://forum.icann.org/lists/fast-track-review-2010/msg00028.html

Nayden Filipov - http://forum.icann.org/lists/fast-track-review-2010/msg00026.html

Pencho Petrov - http://forum.icann.org/lists/fast-track-review-2010/msg00024.html

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Mira Doikova (Bulgarian Netizens Group) - http://forum.icann.org/lists/fast-track-review-2010/msg00023.html

Stoyan Danev (2 comments) - http://forum.icann.org/lists/fast-track-review-2010/msg00021.html and http://forum.icann.org/lists/fast-track-review-2010/msg00002.html

Petar Mehmedov - http://forum.icann.org/lists/fast-track-review-2010/msg00020.html

Kalina Uzunova - http://forum.icann.org/lists/fast-track-review-2010/msg00019.html

Association UNINET - http://forum.icann.org/lists/fast-track-review-2010/msg00016.html

Kristian Hristov - http://forum.icann.org/lists/fast-track-review-2010/msg00014.html

Daniel Asparuhoff - http://forum.icann.org/lists/fast-track-review-2010/msg00013.html

Viktor Boyadjiev - http://forum.icann.org/lists/fast-track-review-2010/msg00012.html

Nikolay Popov - http://forum.icann.org/lists/fast-track-review-2010/msg00011.html

Alek Lynge - http://forum.icann.org/lists/fast-track-review-2010/msg00010.html

Alex Nikolova - http://forum.icann.org/lists/fast-track-review-2010/msg00009.html

George Todoroff - http://forum.icann.org/lists/fast-track-review-2010/msg00008.html

Ludmil Minkov - http://forum.icann.org/lists/fast-track-review-2010/msg00007.html

Nikola Marinov - http://forum.icann.org/lists/fast-track-review-2010/msg00006.html

Petko Kolev - http://forum.icann.org/lists/fast-track-review-2010/msg00005.html

Ivan Stoyankov - http://forum.icann.org/lists/fast-track-review-2010/msg00004.html

Krum Jonev - http://forum.icann.org/lists/fast-track-review-2010/msg00003.html

Jothan Frakes - http://forum.icann.org/lists/fast-track-review-2010/msg00001.html

Volodya - http://forum.icann.org/lists/fast-track-review-2010/msg00000.html

Comments Received (in Public Session)

A public session was held during the ICANN meeting in Cartagena on 6 December 2010 to further discuss how well the process was functioning for the community. Comments from this session have also been incorporated in the above analysis. Information about this session can be found at: http://cartagena39.icann.org/node/15415.

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Next steps

ICANN will publish this document of analysis and recommendations, and provide the document to the ICANN Board of Directors along with an initial set of recommendations. The Board is likely to discuss the Fast Track Review, comments received and initial recommendations at the ICANN Silicon Valley meeting in San Francisco in March 2011.

ICANN will also use this review opportunity to fix minor typographical errors that were identified in the published Final Implementation Plan for IDN ccTLD Fast Track Process document (http://www.icann.org/en/topics/idn/fast-track/idn-cctld-implementation-plan-16nov09-en.pdf.)