25 January 2019

Göran Marby
President and CEO
Internet Corporation for Assigned Names and Numbers (ICANN)

Dear ICANN President and CEO Göran Marby,

Chinese, Japanese, and Korean languages share a script called 'Han' (also called 'Kanji' in Japanese and 'Hanja' in Korean). Under the background of this, Chinese Generation Panel (CGP), Japanese Generation Panel (JGP), and Korean Generation Panel (KGP) have made every effort to cooperatively define their Root Zone Label Generation Rules (Root LGRs) that are mutually consistent and satisfactory. Following from the IDN Variant Issues Project Chinese Case Study Report [1], the Integrated Issues Report [2] and the culmination of the Root Zone LGR project are in effect today. In five years' effort of informal and formal cooperation since the Root Zone LGR project, characters with the same meaning and pronunciation (i.e., the same characters in different forms) have been defined as variants following the agreement in the early stage of the cooperation.

Han characters are not phonetic symbols but ideographs, which means a Han character usually has its own identity as a word. Because of this characteristic, the size of the character repertoire is as big as thousands to tens of thousands. Some of the characters have two or more forms. People in Chinese/Japanese/Korean (CJK) language communities who are accustomed to Han characters are capable to identify visual difference between characters and between strings in their language scripts. In the background stated, CJK GPs decided that the characters with the same meaning and pronunciation were grouped as variants and also decided that characters having visual similarity were not the basis of variants. This is consistent with the findings in the said Chinese Case Study Report and addresses the deficiencies identified by the Integrated Issues Report in including the Japanese and Korean communities in this round of deliberations. In cases where visual similarity of strings causes confusability between (potential) TLDs, CJK GPs think such issues should be resolved by String Similarity Panels during TLD string evaluation, String Confusion Objection and String Contention Mechanisms or by user application tools such as browsers. This is also true for strings made of characters picked up from multiple scripts such as in Japanese (Kanji and Kana) and Korean (Hanja and Hangul) languages.

With Integration Panel's (IP's) support, the frameworks of Chinese Root LGR, Japanese Root LGR, and Korean Root LGR were almost finished in early 2017. However, IP (and ICANN) started to request that visual similarity between characters must be considered within the Root Zone LGR if there existed any visual similarity in the repertoire. However, CGP, JGP and KGP understood and still understand this request was/is not a mandate for the GPs to implement, as described below.

Firstly, "Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels (Version 2013-03-20b)" [3] describes that "While resolving string-confusability issues is beyond the scope of this project, the integration panel will need to take into consideration the consequences of the label generation rules for the Usability and Conservatism Principles." in its "B.5.3.1. Script and Script_Extension". This indicates that string-confusability including visual similarity of characters does not necessarily have to be solved in LGR. This is also consistent with the said Variant Issue Project Case Study Reports and the Integrated Issues Report.

Secondly, the definition that "only the characters with the same meaning and pronunciation are regarded as variants" accords with the process in gTLD Applicant Guidebook Version 2012-06-04 [4], since 2.2.1.1 describes "similarity review will be conducted by an independent String Similarity Panel", which is further augmented by the String Confusion Objection process to address the issue of confusingly similar string as included in the GNSO New gTLD policies. Likewise, string similarity and confusability has been taken into consideration for the IDN ccTLD Fast Track process. This is in line with the fact that, for any script, visual similarity can only be judged by human intuition which varies with the individuals. And we think solid definition of "visual similarity" must be made only when the definition is universally understandable and precisely definable if it's ever defined in LGR.

Considering the above, CGP, JGP, and KGP collectively have expressed their reluctance to embed visual similarity in their LGRs during meetings between IP and GPs. The same kind of comment was voiced by Edmon Chung in ICANN63 Public Forum [5] as well.

In summary, CJK GPs believe that incorporating variants into LGR in order to handle visual similarity is improperly over-loading LGR and visual similarity issue, if any, should be resolved outside LGR, such as in initial evaluation, as designed in 2012 new

gTLD introduction program. Therefore, CGP, JGP, and KGP strongly demand IP to withdraw their request of handling visual similarity in LGR.

Best Regards,
Wang Wei：Co-chair of Chinese Generation Panel
Kenny Huang：Co-chair of Chinese Generation Panel
Hiro Hotta：Chair of Japanese Generation Panel
Kim Kyongsok：Chair of Korean Generation Panel
Edmon Chung：Advisor to the CJK Generation Panels

[1] Report on Chinese Variants in Internationalized Top-Level Domains
https://www.icann.org/en/topics/new-gtlds/chinese-vip-issues-report-03oct11-en.pdf
[2] The IDN Variant Issues Project
https://www.icann.org/en/topics/idn/idn-vip-integrated-issues-final-clean-20feb12-en.pdf
[3] Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels (Version 2013-03-20b)
https://www.icann.org/en/system/files/files/draft-lgr-procedure-20mar13-en.pdf
[4] gTLD Applicant Guidebook Version 2012-06-04
https://newgtlds.icann.org/en/applicants/agb/guidebook-full-04jun12-en.pdf
[5] Comment from Edmon Chung in ICANN63 Public Forum 2
https://static.ptbl.co/static/attachments/192307/1540577759.pdf?1540577759