Update IDN ccPDP WG1

The WG is discussing final version of draft Recommendations. It is intended that the Report containing the Draft recommendations is published by the end of August 2012 for public comments.

The draft recommendations will address some of the concerns raised with regard to confusing similarity review as raised by the GAC in its communiqué and others.
In particular, and compared with the Fast Track Process, for the technical and confusing similarity independent reviews of requested IDN ccTLD strings it is recommended that:

1. Confusing similarity review is a two-stage process. The roles and responsibilities should be developed as part of the implementation planning.
2. Methods and criteria for reviews (both technical and confusing similarity) should be specified in greater detail in implementation plan.
3. Method and criteria for confusing similarity must take into account technical, linguistic and visual perception research factors.
4. Transitional arrangement for request under the Fast Track for final validation under overall process.
5. The Implementation Plan for the overall policy should be reviewed and endorsed by ccNSO before becoming effective.

In addition and for clarification in the WG it was raised why all two-letter ASCII codes should be protected through the confusing similarity review, and hence the conservative approach for the test. Note that the language in the GAC communiqué could be interpreted as a suggestion for a more liberal approach, in particular with regard to two letter codes that are currently not allocated by the ISO 3166 Maintenance Agency.

The confusing similarity rule originates from the IDNC WG and Fast Track Implementation Plan and was introduced to minimize the risk of confusion with existing or future two letter country codes in ISO 3166-1 and other TLD's. The risk of string confusion group is not directly a technical issue, but is dependent on the visual perception of TLD strings by average Internet users and further that although not strictly technical string confusion has an adverse impact on the security of the domain name system, and as such should be minimized and mitigated.

The ISO 3166 standard is maintained by ISO 3166 Maintenance Agency (ISO 3166 MA). The ISO 3166 MA is external and independent and one of its main tasks is to associate two-letter codes to the name of a country, dependency or other area geopolitical interest (in the draft overall policy defined as Territory or Territories).

Due to political and other circumstances the list of ISO 3166 entries is dynamic. Over time Territories have been added and eliminated from the list. Some recent examples are:

- Addition of South Sudan to the list, which resulted in SS in the ISO 3166 list

- The dissolution of the Netherlands Antilles and creation of special status for Curacao and Sint Maarten. This resulted in addition of CW and SX to the list and a change of the status of AN under the ISO list.

Under the current ccTLD policy delegation of a (ISO 646 –BV) country code Top Level Domains follows the ISO 3166 list: Once a Territory is added to the list the two letter country code associated with the name of that Territory is eligible to be delegated. As a side effect: a ccTLD by definition is a two-letter ISO 646-BV code. According to the proposals (and Fast Track rules) the length of an IDN ccTLD string is not limited (in effect it could be the official long or short name of a Territory). Under the Fast Track rules some Territories selected a string of 3 or more characters in the applicable script.

Further, the ISO 3166 list is not only used for the creation of country code Top Level Domains, but also for other purposes, for example the marking of freight containers, postal use and as a basis for standard currency codes. In terms of the ISO standard itself: This part of ISO 3166 (ISO 3166-1) is intended for use in any application requiring the expression of current country names in coded form.
Therefore a conservative approach has been chosen and all combinations of ASCII two letters (a-z) are protected in the confusing similarity review to:

1. Maintain current and future parity between the ISO 3166-1 list and the policy for delegation of ASII two letter country code Top Level Domains. Only on this basis it can be ensured that:
    a. Future two letter country code Top Level Domains (such .SX and .CW) can remain to be delegated and
    b. The ISO 3166 standard maintains its current status, in the context of the delegation of ccTLD's (including IDN ccTLD's) and other applications.
2. Ensure that the overall policy for the selection of IDN ccTLD's does not impact upon the current policy for the delegation of ccTLD's. This would be out of scope of this (IDN ccTLD) country code Policy Development Process.