

The ICANN GNSO “Business Constituency”



ICANN Business Constituency (BC) Comment on [String Similarity Evaluation Guidelines for New gTLD Program: 2026 Round](#)

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Background

This document provides input from the ICANN Business Constituency (BC), from the perspective of business users and registrants. We advocate for ICANN policy that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

General Comment:

From a business standpoint, string similarity determinations are a foundational safeguard against user confusion, fraud, brand harm, and erosion of confidence in the DNS. The String Similarity Evaluation (SSE) Guidelines are therefore a critical component of the New gTLD Program: 2026 Round.

The BC appreciates the opportunity to comment on the updated String Similarity Evaluation Guidelines and acknowledges the extensive work undertaken by ICANN org, script experts, and the community to operationalise the recommendations of the GNSO New gTLD Subsequent Procedures PDP and the IDN EPDP Phase 1 Final Report.

The BC broadly supports the objectives of the SSE Guidelines, including the use of expert-developed SSE data and the SSE tool to manage scale, complexity, and consistency in evaluating visual similarity across scripts and variant strings. We particularly welcome the recognition that the SSE tool is an assistive mechanism and that final determinations appropriately rest with the SSE Panel, supported by documented rationale.

That said, from a business and registrant perspective, predictability, transparency, and consistency in string similarity outcomes are essential. Applicants and existing rights holders make substantial investment, branding, and compliance decisions based on reasonable expectations of how similarity will be assessed. Any perceived subjectivity, inconsistency, or lack of explainability in outcomes risks undermining confidence in the New gTLD Program.

BC Observations and Recommendations

1. Transparency and explainability of SSE Panel decisions

While the Guidelines appropriately require the SSE Panel to provide rationale when overriding SSE tool outputs, the BC recommends that this requirement be strengthened through clearer expectations on the **content and structure of rationales**.

From a business perspective, applicants must be able to understand *why* a string was found similar or not similar, particularly in borderline or overridden cases. The BC recommends that ICANN require SSE Panel rationales to:

- Clearly reference the relevant similarity levels, scripts, or guideline provisions applied
- Explicitly explain any deviation from SSE tool results and
- Be published in a consistent and accessible format to support transparency, predictability, and potential future learning.

This will reduce uncertainty, limit perceptions of arbitrariness, and support confidence in outcomes.

2. Consistency and mitigation of inter-panelist subjectivity

The BC supports the requirement for a uniform process across SSE panelists. However, given the inherently judgment-based nature of visual similarity, the BC encourages ICANN to further strengthen safeguards against inconsistent interpretations across panelists, scripts, or contention sets.

We recommend:

- Enhanced calibration exercises and documented internal guidance for panelists prior to evaluations.
- Periodic internal consistency checks across panel decisions and
Clear documentation of how differing expert views are reconciled in final determinations.

Consistency is particularly important for businesses operating across multiple scripts, markets, and jurisdictions.

3. Conservative approach and business risk considerations

The BC agrees with the guidance that, in cases of uncertainty, a conservative approach should be applied. From a business perspective, the cost of allowing confusingly similar strings into the root is significantly higher than the cost of rejecting or placing strings into contention.

User confusion can result in:

- Phishing, fraud, and impersonation risks.

- Brand dilution and enforcement costs and
- Reduced trust in DNS navigation, particularly for multilingual and cross-script users.

The BC therefore supports maintaining a high threshold for allowing visually similar strings to proceed and encourages the SSE Panel to explicitly consider downstream business and end-user risk when exercising discretion.

4. Treatment of cross-script and simple-shape similarities

The BC commends the detailed treatment of cross-script similarities, simple shapes, casing, and rendering behaviours (including underlining and platform variability). These factors reflect real-world user experiences and should remain firmly within scope.

However, given rapid evolution in fonts, interfaces, browsers, and AI-driven content presentation, the BC encourages ICANN to treat the SSE data and guidelines as **living instruments**. We recommend that ICANN establish a clear post-round review mechanism to assess whether observed user confusion, abuse patterns, or operational issues suggest the need for future refinement of similarity criteria.

Closing Statement

In closing, the ICANN Business Constituency supports the SSE Guidelines as an essential safeguard for maintaining trust, usability, and security in the DNS during the New gTLD Program: 2026 Round. We encourage ICANN to continue prioritising transparency, consistency, and predictability in string similarity evaluations, recognising the substantial reliance interests of businesses, registrants, and end users worldwide.

As the DNS ecosystem grows increasingly multilingual and complex, robust and explainable string similarity evaluation will remain central to protecting users, enabling responsible innovation, and sustaining confidence in ICANN's multistakeholder model.

This comment was drafted by Rachael Shitanda. It was approved in accordance with our [Charter](#).