



**Comment on Draft Final
Report from the Expert
Working Group on
Internationalized
Registration Data**

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Business Constituency Submission

GNSO//CSG//BC

Background

This document is the response of the ICANN Business Constituency (BC). The BC's comments arise from the perspective of Business users and registrants, as defined in our Charter¹:

The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet 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.

ICANN opened a public comment period on the Draft Final Report from the Expert Working Group on Internationalized Registration Data².

The BC had submitted comments on the Interim Report from the Expert Working Group on Internationalized Registration Data (IRD Working Group)³. In these comments, the BC supported the proposal for internationalized registration data and specifically recommended the adoption of free-form text for all name and address fields ("Proposal 3"), with non-ASCII character sets supported but not required.

Comments

The BC supports the Proposed High Level Requirements contained in Section 4 of the Draft Final Report⁴ with the following comments:

- Registrants should only be required to input registration data in language(s) and script(s) with which they are skilled.

The BC supports this principle. As stated in our previous comment, the BC believes that, to balance the needs of domain name owners, registrars, and users of Whois, it is important that non-ASCII character sets are supported but not required, meaning that registrants may use ASCII or non-ASCII scripts according to their skill set.

As noted by the IRD Working Group in its comments to the BC⁵, it should not be optional to provide the choice between using ASCII or non-ASCII scripts to registrants. Any perception that this is not in line with the BC's previous comments is mistaken.

¹ Business Constituency Charter, at <http://www.bizconst.org/charter.htm>.

² Internationalized Registration Data Expert Working Group Draft Final Report Public Comment Opened, at <https://www.icann.org/public-comments/ird-draft-final-2015-03-09-en>.

³ Business Constituency Comment on Internationalized Registration Data Interim Report, June 4, 2014, at <http://forum.icann.org/lists/comments-ird-interim-14apr14/msg00003.html>.

⁴ IRD Working Group Draft Final Report, at 18.

⁵ *Id.*, at 54.

- A registry must be able to accept and store any language or script that might reasonably be expected to be used in their target market.

The BC supports this principle.

- Unless explicitly stated otherwise, all data elements should be tagged with the language(s) and script(s) in use, and this information should always be available with the data element.

The BC supports this principle but also adds that localized tagging does not replace standard US-ASCII data labels, but rather accompanies it. This is the appropriate balance between the needs of the local registrant, registrar and registry, and the global needs of the users of Whois data.

The BC offers the following comments on Section 5 – Proposed Requirements for Individual Data Categories, specifically Section 5.1 – Requirements for organization names, personal names and postal addresses:

The BC notes that the IRD Working Group chose to adopt Proposal 1 (“Free form text. The language(s) and script(s) of an address should be appropriate for the region in which it is located.”) instead of Proposal 3 (“Free form text.”), which the BC supported⁶.

The basic principles which led the BC to support Proposal 3 are encapsulated in Proposal 1, and the BC does not object to that choice. The additional requirement in Proposal 1 serves the overall goal of ensuring contactability of the registrant, and the BC supports.

The BC supports the comments of the IRD Working Group that the contact information should be sufficient to be useful to the local delivery agent, and that the user at that location would be best suited to know what that information is and what form it would take⁷. The BC believes that this can be achieved with Proposal 3 and Proposal 1.

The BC notes the IRD Working Group’s concerns about free form text and validation/verification requirements in the Whois Accuracy Specification of the 2013 Registrar Accreditation Agreement⁸. While feasibility of implementation is an important issue to address, the association of the current requirements of the Whois Accuracy Specification to these data elements (as Section 5.1 relates solely to names and postal addresses) is not entirely applicable. Currently the requirement only requires validation of phone numbers and e-mail addresses. Therefore the BC does not understand how free form text in these data elements would be problematic to registrars at this time.

Overall the BC congratulates the IRD Expert Working Group on this Draft Final Report. Internationalization remains an important goal and the BC supports these efforts to balance the global needs of registrants, registrars, registries and users of Whois data.

This comment was prepared by Tim Chen and Elisa Cooper and approved in accord with the BC Charter.

⁶ *Id.*, at 20-21.

⁷ *Id.*, at 22.

⁸ “A requirement to accept any data would be expected to make the validation of the data, a recent requirement added to registrars, problematic in the best case.” IRD Working Group Draft Final Report Section 5.1.2, at p. 21.