

18 June 2019

Via email

Göran Marby
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers (ICANN)

Dear Göran,

I refer to your letter of 24 May 2019, responding to the “RySG Statement on IDN Variant TLD Management Framework Recommendations et al.” sent to the GNSO Council on 30 April 2019. The additional information in your letter was helpful insofar as it provided context to some of the issues the RySG raised. Following a review of the information contained in your letter by a number of our members that, collectively, have been involved in many of the work efforts associated with IDNs over the years, it seems there are a number of areas where we disagree:

1. **IDN Variant TLD Recommendations** - We are pleased that ICANN agrees there are potential implications to existing TLDs, which will have impacts to existing contracts. This is the reason the RySG raised the issue with the GNSO Council, so that the Council could determine the best policy vehicle to address the approved recommendations by the ICANN Board.
2. **Review and approval of IDN Tables** - The RySG respects the fact that ICANN wants to incorporate the latest standards and technical advice into their second level reference label generation rules (LGRs) to improve the security and stability of the DNS. Their implementation and enforcement, however, must be deliberate within the bottom-up process to provide contracted parties with clarity and transparency with respect to our obligations. For example: the reference tables for Arabic script and language developed by Internetstifelsen i Sverige (IIS) were updated on 4 April 2019; this happened without any notification or publication of such changes. This situation, as you can imagine, is not transparent and introduces uncertainty to the process. The RySG believes there is room for improvement.
3. **IDN Guidelines vis-a-vis IDN Variant TLD Recommendations** - The RySG agrees with the assertion that there are commonalities and differences between the two work products and they should be dealt with appropriately.
4. **IDN Guidelines version 4 origin** - The RySG respectfully disagrees with the assertion that the latest revision of the IDN Guidelines was requested by the GNSO Council. The update of the IDN Guidelines was requested by Akram Atallah, then President of the GDD in a letter of 3 December 2014 to Jonathan Robinson, then Chair of the GNSO Council and the GNSO Council subsequently acted on that request.

Given that we have areas of disagreement, I agree that learning from each other through open and constructive dialogue is a good way forward on the important topic of IDNs and we would welcome the opportunity to continue working on these issues with the goal to improve transparency, consistency and predictability of our processes.

The RySG looks forward to working with you and the rest of the ICANN staff.

Sincerely,

Donna

Donna Austin
RySG Chair