**ALAC Response to the VIP Proposed Project Plan for Next Steps (20 February 2012)**

ALAC appreciates the opportunity to comment on the Internationalized Domain Names (IDN) Variant Issues Project (VIP) Proposed Project Plan. First of all, ALAC would like to applaud and congratulate the IDN VIP team on the successful completion of the case study reports and the final integrated report. ALAC also thank the IDN VIP team for meeting with the ALAC IDN Working Group to better explain their thinking behind the Proposed Project Plan.

ALAC reiterates its continued recognition of the significance and importance of IDNs, including IDN TLDs, for ICANN in enhancing diversity and embracing multilingualism on the Internet. More importantly, the proper and prompt implementation of IDN, including IDN Variants, that respect the cultural conventions and the long standing work from many of the IDN communities around the world, and to avoid further and unnecessary delay in the implementation of IDN Variant TLDs at the root. ALAC further reiterates its concern that some of the work in the Proposed Project Plan might duplicate work already undertaken by the Internet Engineering Task Force (IETF) and the reduced levels of transparency associated with contracting out services that might be better served by staff and led by community volunteers.

Specifically regarding the Proposed Project Plan, ALAC expresses its concern that:

1. The Proposed Project Plan deviated from the community consensus that because the IDN Variant issues are different across different cultural, linguistic and script communities, the IDN Variant issue is best addressed by respecting the diversity and avoiding a one-size-fits-all approach by proceeding on a language/script or groups of languages/scripts basis; and
2. The Proposed Project Plan has moved away from a practical approach that drives towards implementation to an overly theoretical approach in considering absolute rather than relative risks, costs and benefits, and failing to produce a clear roadmap and timeline for addressing the expressed community need for the implementation of IDN Variant TLDs.

ALAC observes that much of the motivation behind the Proposed Project Plan from the VIP team seems to be based on the perceived political risks of disadvantaging language communities that may not have been participating in the discussions so far, and that of having to make decisions on language/script codepoint repertoire boundaries based on policy rather than technical parameters. ALAC however observes that the risks of marginalizing language communities that have been contributing continuously and significantly to the development of IDN Variants must also be considered equally. Furthermore, especially with the understanding of the possibility that there may be language communities that have not been participating yet, the approach forward should not make any assumption that we can come up with an all encompassing codepoint repertoire and label generation ruleset within any reasonable timeframe.

Therefore, rather than an exclusive approach (i.e. predetermining all the codepoints allowed) as seems to be suggested by the Proposed Project Plan, an inclusive approach consistent with the ICANN IDN Guidelines should be used. Such inclusive approach would also afford ICANN to adhere to its multi-stakeholder bottom-up approach by relying on community consensus in the identification and determination of included codepoints by language/script or groups of languages/scripts. With an administrative framework, rather than a purely technical one, language communities that enter later would not be disadvantaged because they could utilize the same administrative framework and the multi-stakeholder bottom-up community consensus building process to arrive at the codepoint repertoire and label generation rulesets to handle IDN Variant TLDs for their language community. Moreover, such process not only reduces political stress for the system in that all language/script communities are treated the same without preferential treatment and allowed to progress at their own pace, it also reduces the risks of new additions, if any, challenging and requiring changes to the “universal” repertoire and ruleset.

ALAC understands and appreciates that security risk considerations are paramount. Nevertheless, it is impractical to require absolute security in the introduction of any new administrative or technological advancement. Understanding the risks, having enough measures to mitigate against them and most importantly a balance of risks and benefits should be the deciding factors. ALAC believes that based on the demonstrated community need and the findings of the VIP case study reports, the benefits for implementing IDN Variant TLDs significantly out-weigh the risks. Given that the technical community, including the IETF and the IAB, has iterated that IDN Variants cannot be solved with a technical solution based on current DNS standards, ALAC agrees with the view that in the immediate term, the implementation of IDN Variant TLDs should be focused on the development of an administrative approach.

The success of the VIP case study team reports and integrated report demonstrates the value of by language/script (or groups of languages/scripts) approach. ALAC advises the VIP team to follow the community consensus, focus its efforts on the delivery of an administrative framework that leads towards implementation of IDN Variant TLDs in the root, proceed with separate parallel projects by language/script (or groups of languages/scripts), and to adhere to a community-led approach in its work.

Finally, ALAC suggests that the VIP team:

* Revise the Proposed Project Plan to reflect the above advise
* Build on the successful foundation of the case study team reports and proceed with engaging the language/script communities on separate parallel projects (including some or all of the elements identified in the currently Proposed Project Plan, but tackled by language/script or groups of languages/scripts)
* Refine the findings from the integrated report into an administrative framework (i.e. checklist of elements to be considered, e.g. codepoint repertoire, codepoint overlap, label generation ruleset, types and states of variants, etc.) that can be used by language communities in the completion of its IDN Variant TLD policy implementation plan for their language/script (or groups of languages/scripts)