Comments of GNSO Intellectual Property Constituency

May 27, 2014

https://www.icann.org/public-comments/ird-interim-2014-04-14-en

The Intellectual Property Constituency (IPC) thanks the members of the Expert Working Group on Internationalized Registration Data for their work on the Interim Report. See http://gnso.icann.org/en/issues/ird/interim-report-10apr14-en.pdf.

IPC members depend on ready access to accurate registration data for a host of critical business purposes. We approach the Interim Report primarily from the perspective of users of registration data. We offer the following brief comments on it:

(1) We support the basic "principles of internationalization" developed by the IRD Working Group. We note that the "user capability principle" should be applied not only to the activities of registrants in supplying data, but also to the activities of users of registration data. In both cases, "users should not be burdened with tasks that he/she could not complete." (IRD Interim Report pages 4-5.)

(2) The Interim Report presents three options for internationalization of data on the address of the registrant and other contacts. While we recognize that each option has pros and cons (as summarized on pages 18-20 of the Interim Report), our preference is for option 2, under which the script used for this data would either be the script of the TLD itself, or else US-ASCII. This approach adequately caters to the needs of registrants while preserving the ability of many registration data users to read the data, thus enabling the registration data service achieve its goals of providing transparency and accountability in the DNS. We believe that option 1, that any language or script that is "appropriate for the region that it is located [sic]," would work in many cases, but would present practical problems, especially when the registry is located in one region but registrants are located in another region.

In this regard, the Interim Report makes the important observation that "the extent of registrars' support of internationalized registration data is also a business decision for the registrar. There may be languages/scripts a registrar may not support at their own discretion." (page 16). However, registrars are exceedingly likely to support one or both of the scripts designated in option 2 (the TLD script or US-ASCII). Thus, option 2 should be workable from this perspective. IPC looks forward to further discussion of this issue and consideration of the alternatives.

(3) If the choice of script(s) used for address data were constrained, as it would be under either option 1 or option 2, we are not clear why the same constraints should not apply to other data categories consisting primarily of characters, notably name and organization name. If these categories are not given similar treatment, the disparity should be justified.

Thank you for considering our views.