Comments of the Draft WGIG Issue Paper on the Multilingualization of Internet Naming System

Note: The original text from the draft WGIG paper is in italic and is followed by the respective comment.

Section 1.2

" IDN(Internationalized Domain Name) is designed to use the multilingual characters as well as English alphabet, numerical character and some symbols without any modification to existing DNS systems. However, it presently does not allow the TLDs to use the multilingual characters, which is still on the table of debate for further improvement. "

This paragraph sounds as if there is some technical limitation on the use of multilingual characters for TLDs, which is rather a policy issue that involves introduction of new TLDs.

Section 3.2

" The multilingual process of IDN does not take place at the server side, but at the client side. This requires a client software to be installed on every individual.s personal computer for the necessary function of converting multilingual code to ASCII code. It is becoming to a certain degree obstacles for flourishing the service. To alleviate this problem, many people proposed to have a built-in IDN client software in every browser which could contribute and assist to the deployment of IDN service. However, major browser companies such as, Microsoft has not yet put up a clear schedule for such an updates. "

It is important to stress on the fact that any built-in IDN client software should accommodate for applications in general and not only for browsers. As for example email client applications are very important to be included in the process of IDN.

Section 4.1

"   - ICANN: Name policy
- IETF: Technical standardization
- MINC: Service promotion and discussion forum for local players
- I-DNS: Initial technology initiator and service provider
- JPRS, KRNIC, CNNIC, HKNIC: Major steering actors
* In China, IDN for ccTLD has been tested and applied independently.
- TLD registry: Service registries
- government: active especially in non-English speaking countries "

The different actors in this section should be listed by categories, while listing examples in some case. thus avoiding any bias to a specific technology provider or to a specific language. For example they could be grouped a: Technology Providers – Language Specific Groups or Organizations – International Organizations – TLD Registries – and so on.

Section 5.1.1

"IDN fundamentally holds the identical DNS governance mechanism. ICANN takes in share of the policy and IETF is responsible for the technical standardization. Under the supervision of the US government, ICANN is handling policies including confirmation of language code table, decision of supporting multilingual TLD, registration policy for script variants, etc. Currently, China, Japan, Korea, Hong Kong and Middle East countries are actively participating in such activities. And as mentioned above, IETF is handling the entire activities that are related to technical standards. "

In this section it is better to use Arab countries instead of Middle East countries.

Section 5.2.1.b

" The multilingual Internet names are the Internet address resources of each country, and the administration should fall under each sovereign state. "

This text does not apply for languages that are the official languages of more than one country, such as the Arabic language. In such case the language sovereignty is even more important, to avoid having non-standard (and hence non-predictable) registrations of the same language within different TLDs.

Section 5.2.2.b

" The ccTLD registry may choose independently the IDN languages (or choose a font combination in one language) for the ccTLD. "

For some language it makes more sense to have a common definition of the language table used by different ccTLDs or gTLDs. This makes the language use easier and more predictable for the end-user. Therefore it is suggested to have pre-defined tables for the different languages, to be used by the various TLDs, at least for those languages where their respective communities have identified the need for such a standardization.