Registries Stakeholder Group Statement

Issue: **Study on Technical Use of Root Zone Label Generation Rules**

Date statement submitted: **19 July 2019**
Reference url: https://www.icann.org/public-comments/technical-rz-lgr-2019-05-15-en

Background[1]

The RZ-LGR, at its core, is a resource that has been developed by the community to offer consistent and predictable validation of strings intended for TLDs, and calculation of their variant labels.

As the RZ-LGR is being incrementally developed by the community, the RZ-LGR Study Group (SG) was constituted on the request of the ICANN Board to study technical considerations for utilizing the RZ-LGR to determine valid top-level domains (TLDs) and their variant labels in a harmonized manner.

After community input, the final recommendations will be presented to the ICANN Board for consideration.

Registries Stakeholder Group (RySG) comment:

Introduction

The Registries Stakeholder Group (RySG) wants to express its appreciation for the work and commitment of the members of the RZ-LGR Study Group and welcomes the opportunity to comment on the proposed Recommendations for the Technical Utilization of the Root Zone Label Generation Rules (RZ-LGR).

1. Scope

With respect to the scope of the RZ-LGR, while it may be intuitive to some it may be worth mentioning that the intended use of the RZ-LGR is the root and it should not be used for higher levels (e.g. second level) of the DNS without proper consideration.

The RySG is supportive of and agrees with SSAC's assertion on this matter; per SAC060 (recommendation 3) "the root zone is a special case and the approach taken to variant management in the root need not prescribe the approach taken by individual TLD

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[1] *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*

registries''. Furthermore "the SSAC asserts that TLD registry operators should not have an automatic obligation to abide by all the same variant tables and policies used at the root level of the DNS and ICANN should first and foremost concentrate on the rules for the root zone".

2. Delegated TLDs (Section 3.1).

Regarding the assertion "Any such variations (i.e. synchronized TLDs) should be considered for alignment with RZ-LGR", the RySG recommends deferring this issue to the IDN Variant TLD Management process since the RZ-LGR merely declares two or more labels as variants, but the RZ-LGR does not (and should not) assume a variant management mechanism due to the legal and operational considerations that are outside the scope of the RZ-LGR.

3. **Applied-for TLD whose script is not supported by RZ-LGR (Section 5)**.

The RySG supports the use of RZ-LGR as the authoritative source to algorithmically validate a top-level domain label and to calculate its variant labels. Therefore, we support Option A.