

Registries Stakeholder Group

Overview of Public Comments 2024

Update June 2024

PUBLIC COMMENTS

1st quarter 2024

- Draft Final Report of the 2023 Africa Domain name Industry Study
- Draft ICANN FY25 Plans
- Draft PTI FY25 Operating Plan and Budget
- Draft NCAP Study 2 Report and Responses to Questions Regarding Name Collisions
- Phase 1 Final Report of the EPDP on Internationalized Domain Names
- Proposed Language for Draft Sections of the Next Round Applicant Guidebook
- Proposed Top-Level Domain String for Private Use

2nd quarter 2024

- String Similarity Review Guidelines
- Proposed Bylaws Updates to Limit Access to Accountability Mechanisms
- Review of the Draft Registry Service Provider (RSP) Handbook - New gTLD Program
- Review of the Registry System Testing 2.0 Test Specifications and API
- Phase 2 Initial Report of the EPDP on Internationalized Domain Names

OTHER COMMENT OPPORTUNITIES

- Community Consultation on PICs/RVCs

RYSG TAKEAWAYS ICANN PUBLIC MEETINGS

- ICANN 79 Community Forum
- ICANN 80 Policy Forum

PUBLIC COMMENTS

1ST QUARTER 2024

DRAFT FINAL REPORT OF THE 2023 AFRICA DOMAIN NAME INDUSTRY STUDY

The Registries Stakeholder Group (RySG) acknowledged that the 2023 African DNS Study is a rich and detailed resource on Africa's Digital environment but suggested that the report be more focused on the DNS Industry in its analysis and recommendations. In addition, the RySG submitted detailed comments and questions on specific items in the report.

Links: [RySG Comment \(8 Feb\)](#) – [ICANN org Report of Comments \(14 March\)](#)

DRAFT ICANN FY25 PLANS

The Registries Stakeholder Group (RySG) provided comments on ICANN's FY25 Plans. In line with previous comments, it expressed concerns about the complexity of ICANN's Budget documentation and invited ICANN to simplify its financial reporting. In line with ICANN's guidance about the termination of the additional budget request (ABR) process, the RySG included an additional budget request in its comment. The RySG further provided comments on Operating initiative 9 (new gTLD auction proceeds recommendations) and Operating initiative 11 (ICANN Reserves).

Links: [RySG Comment \(12 Feb\)](#) - [ICANN org Report of Comments \(2 April\)](#)

DRAFT PTI FY25 OPERATING PLAN AND BUDGET

The Registries Stakeholder Group (RySG) expressed support for PTI's FY25 Operating plan and Budget and appreciation for PTI's efforts to address previous RySG questions and comments.

Links: [RySG Comment \(12 Feb\)](#) – [ICANN Staff Report on Comments \(11 March\)](#)

DRAFT NCAP STUDY 2 REPORT AND RESPONSES TO QUESTIONS REGARDING NAME COLLISIONS

The Registries Stakeholder Group (RySG) encouraged the Board to take into account ICANN staff's contribution and analysis of privacy issues. As evidenced by the RySG's engagement in community efforts, the RySG has experience and interest in addressing privacy concerns. We appreciate the Board's consideration of the issue and are happy to share our expertise and experience as appropriate. The RySG supports the Board maintaining momentum on these recommendations while looking for constructive and efficient ways to continue to examine the highlighted concerns. As this topic has been identified as on the critical path for the ongoing Subsequent Procedures work, we encourage prompt review by the Board.

Links: [RySG Comment \(28 Feb\)](#) – [ICANN org Report of Comments \(13 March\)](#)

PHASE 1 FINAL REPORT OF THE EPDP ON INTERNATIONALIZED DOMAIN NAMES

The Registries Stakeholder Group (RySG) noted that in developing recommendations, the EPDP WG should be mindful of maintaining a balance between creating rules for IDNs that promote security and stability, but are not so onerous that they create an undue burden for Registry Operators to operationalize IDNs and offer them to

customers. The RySG supports the ability to offer IDNs to enable domain name registrants to register and use domain names in the languages and scripts they use, but at the point where IDNs become too difficult to implement, that hampers the ability of Registry Operators to offer that service to those users.

Links: [RySG Comment \(12 March\)](#) – [ICANN org Report of Comments \(26 March\)](#)

PROPOSED LANGUAGE FOR DRAFT SECTIONS OF THE NEXT ROUND APPLICANT GUIDEBOOK

The Registries Stakeholder Group (RySG) welcomed the opportunity to comment on these draft sections of the Draft Applicant Guidebook and noted that while the sections are consistent with the recommendations, there are areas where more clarity would be beneficial.

Links: [RySG Comment \(19 March\)](#) – [ICANN org Report of Comments \(2 April\)](#)

PROPOSED TOP-LEVEL DOMAIN STRING FOR PRIVATE USE

The Registries Stakeholder Group (RySG) agrees with IANA's determination that ".INTERNAL" meets the criteria and supports the selection of ".INTERNAL" to be reserved at the top level of the Domain Name System (DNS) for private use.

Links: [RySG Comment \(21 March\)](#) – [ICANN org Report of Comments \(16 April\)](#)

2ND QUARTER 2024

STRING SIMILARITY REVIEW GUIDELINES

The Registries Stakeholder Group (RySG) appreciates the opportunity to comment on this issue. The RySG recognizes and thanks the group for their work to update the guidelines for conducting string similarity reviews to include variant strings. The work of the String Similarity Review Panel is an important part of the application review process. The RySG supports maintaining clear and comprehensive guidelines and methodology.

Links: [RySG Comment \(10 April\)](#) – [ICANN org Report of Comments \(15 May\)](#)

PROPOSED BYLAWS UPDATES TO LIMIT ACCESS TO ACCOUNTABILITY MECHANISMS

The RySG does not believe the proposed Bylaws amendment is an appropriate method for implementing the CCWG's Recommendation 7, but would instead support a more narrowly scoped amendment, limited to restricting access to the Accountability Mechanisms for decisions made as part of ICANN's Grant Program.

Links: [RySG Comment \(15 April\)](#) – ICANN org Report of Comments (not yet published)

REVIEW OF THE DRAFT REGISTRY SERVICE PROVIDER (RSP) HANDBOOK - NEW GTLD PROGRAM

The RySG provided feedback on all aspects of the Registry Service Provider (RSP) Evaluation Program, as described in the draft RSP Handbook.

Links: [RySG Comment \(21 April\)](#) – [ICANN org Report of Comments \(17 May\)](#)

REVIEW OF THE REGISTRY SYSTEM TESTING 2.0 TEST SPECIFICATIONS AND API

The RySG suggested including an OT&E test environment with the API interface in order to fully assess and determine if the code suggested is properly reflecting the recommendations of the SubPro PDP final report and suggested including clarification on how to address the case for TLDs operating under IDN rules / policies that precede the SubPro Final Report.

Links: [RySG Comment \(6 May\)](#) – [ICANN org Report of Comments \(31 May\)](#)

PHASE 2 INITIAL REPORT OF THE EPDP ON INTERNATIONALIZED DOMAIN NAMES

The RySG provided feedback on the twenty (20) preliminary recommendations, which focus on Phase 2 questions included in the EPDP Team’s charter on the following topics: “Same entity” at the second-level and IDN Table harmonization; Adjustments in registry agreement, registry service, registry transition process, and other processes/procedures related to the domain name lifecycle; Adjustments in registration dispute-resolution procedures and trademark protection mechanisms; and Process to update the IDN Implementation Guidelines.

Links: [RySG Comment \(21 May\)](#) – [ICANN org Report of Comments \(17 May\)](#)

OTHER COMMENT OPPORTUNITIES

COMMUNITY CONSULTATION ON PICS/RVCS

The Registries Stakeholder Group (RySG) noted in its feedback that the matters covered by the community consultation were far too nuanced to be answered by the provided multiple choice questionnaire and called for in depth discussion and debate to develop the most appropriate way to handle the numerous different cases that may occur.

Links: [RySG input \(22 Feb\)](#)

RYSG TAKEAWAYS ICANN PUBLIC MEETINGS

The Registries Stakeholder Group (RySG) shared observations and takeaways of the ICANN Public Meetings to provide quick feedback and highlight issues of importance to the Registries. The points raised are intended as input for the Community to further the work between the ICANN meetings.

ICANN 79 COMMUNITY FORUM

[RySG Takeaways ICANN 79 Community Forum, San Juan, 2-7 March](#)

ICANN 80 POLICY FORUM

RySG Takeaways ICANN 80 Policy Forum, Kigali, 10-13 June (not yet published)