

----- Original Message -----

Subject: [IDN #298461] Form submission from: IDN ccTLD Fast Track String  
Evaluation Request System  
Date: 2020-12-10 13:26  
From: "Pitinan Kooarmornpatana via RT" <[idnft@icann.org](mailto:idnft@icann.org)>  
To: [idn@pandi.id](mailto:idn@pandi.id), [yudho@pandi.id](mailto:yudho@pandi.id)  
Reply-To: [idnft@icann.org](mailto:idnft@icann.org)

Dear Professor Yudho,

## DNS Stability Panel Report:

The DNS Stability Panel reviewed the applied-for IDN ccTLD string described in the attached document in accordance with the "Final Implementation Plan for IDN ccTLD Fast Track Process" (<http://www.icann.org/en/resources/idn/fast-track/idn-cctld-implementation-plan-28mar19-en.pdf> [FTIP]). This report contains the Panel's findings with respect to this string.

1. We note, as the context for our evaluation of "confusable strings," that a sufficiently creative choice of type styles and/or exploitation of information about scripts that a given user may be unable to display can cause any character (or character sequence) in one script to be visually confusable with one or more characters (or character sequence(s)) in some other script. We also note that this "intrinsic confusability" issue is more serious for closely related scripts, such as Cyrillic, Greek, and Latin, and the neo-Brahmi scripts that India and ICANN have decided are related closely enough to require only a single LGR Generation Panel; and for scripts that are used by different languages, such as Arabic (e.g., Arabic, Fula, Kashmiri, Sindhi, and Urdu), Cyrillic (e.g., Russian and Ukrainian), and Devanagari (e.g., Hindi, Sanskrit, and Santali). Distinctions that may be clear when the language is known may be difficult or impossible to recognize when, as in the DNS, it generally cannot be known.

We understand that ICANN is aware of these issues and has decided to accept the risks involved in order to accommodate a broad range of IDN TLDs. We have therefore limited our assessment of "confusability" to benign environments in which deliberate attacks that exploit presentation variability (including type styles and user system configuration) are not considered. In general, we focus on the confusability that may arise from the basic geometry of characters that is preserved, to greater or lesser degree, across a variety of fonts, styles, and formatting.

2. Mindful of the scope defined by the FTIP for the DNS Stability Panel, we note that the applied-for string meets only the "formal confirmation" requirement of FTIP Section 3.2, "Language and Script Criteria."

(1) If the language is listed for the relevant country or territory as an ISO 639 language in Part Three of the Technical Reference Manual for the standardization of Geographical Names, United Nations Group of Experts on Geographical Names ("UNGEGN Manual") (<http://unstats.un.org/unsd/geoinfo/UNGEGN/publications.html>).

Javanese is not listed as a "language in which geographical names of a particular country are likely to occur" for Indonesia in Part 2(B) Section I, "List of countries, languages and writing systems," of the UNEG Technical Reference Manual for the standardization of Geographical Names ([\[unstats.un.org\]https://unstats.un.org/unsd/geoinfo/ungegn/docs/pubs/UNGEGN%20tech%20ref%20manual\\_m87\\_combined.pdf](http://unstats.un.org/unsd/geoinfo/ungegn/docs/pubs/UNGEGN%20tech%20ref%20manual_m87_combined.pdf)), nor is it listed in the Table of country names in Part 3 of the Manual.

(2) If the language is listed as an administrative language for the relevant country or territory in the ISO 3166-1 standard under column 9 or 10.

Javanese is not listed as an administrative language for Indonesia in the ISO 3166-1 standard under column 9 or 10 (<https://www.iso.org/obp/ui/#iso:code:3166:ID>).

(3) If the relevant public authority in the country or territory confirms that the language is used or served as follows, (either by letter or link to the relevant government constitution or other online documentation from an official government website): a. used in official communications of the relevant public authority; and b. serves as a language of administration.

The letter from the Director General of Culture, Ministry of Education and Culture of the Republic of Indonesia dated 20 May 2020 corresponds properly to the template in Appendix 1 to Module 3 of the FTIP. While accepting this representation as meeting the third criterion of Section 3.2, we note that it is difficult to reconcile with considerable evidence that the Javanese script is not commonly used within the country; the Javanese language is written today only in Latin-based characters except for scholarly, historical, or decorative purposes.

3. We note that the entire block of Javanese characters U+A980 through U+A9DF is excluded from the Integration Panel's Maximal Starting Repertoire (MSR-4 <https://www.icann.org/en/system/files/files/msr-4-overview-25jan19-en.pdf>), following the direction of ICANN's Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels [icann.org] (the "Procedure" <https://www.icann.org/en/system/files/files/draft-lgr-procedure-20mar13-en.pdf>): "The panel must exclude any code points used only for archaic or historical purposes." The exclusion of the Javanese script from the MSR follows its designation as a "Limited Use Script" ([https://unicode.org/reports/tr31/#Table\\_Limited\\_Use\\_Scripts](https://unicode.org/reports/tr31/#Table_Limited_Use_Scripts)) in Section 2.4 Table 7 of Unicode Identifier and Pattern Syntax (UAX#31 <http://www.unicode.org/reports/tr31/tr31-33.html>). The current Unicode identifier status (<https://www.unicode.org/Public/security/latest/IdentifierStatus.txt>) of the code points in the Javanese script block is "restricted." Unicode Security Mechanisms (UTS#39 <http://www.unicode.org/reports/tr39/>) recommends that "[r]estricted characters should be treated with caution in registration, and disallowed unless there is good reason to allow them in the environment in question."

4. We note that the most recent Root Zone Label Generation Rules document (RZ-LGR-4 <https://www.icann.org/resources/pages/root-zone-lgr-2015-06-21-en>) refers to the MSR exclusion in Section 3.2.1 Repertoire: "The MSR excludes code points used for historical or special purposes only." We note that no Label Generation Panel following the Procedure would produce Proposed LGRs including characters explicitly excluded from the MSR, and that the Integration Panel would not incorporate Proposed LGRs containing explicitly excluded characters into a future version of the RZ-LGR.

5. We note that Indonesia has submitted no other application to the Fast Track for an IDN ccTLD. The current application is for an IDN ccTLD in a script that is rarely used within the country, associated with a language that is not the principal administrative or commercial language of the country, and consisting of characters that are explicitly excluded from the Maximal Starting Repertoire for the Root Zone Label Generation Rules. Mindful of the scope defined by the FTIP for the DNS Stability Panel, we are obliged to note that the current application appears to be inconsistent with the intended purposes and limitations of the Fast Track process (<https://www.icann.org/en/system/files/files/idn-ccTld-implementation-plan-28mar19-en.pdf>):

"Participation in the IDN ccTLD Fast Track Process is limited in accordance with the IDNC WG recommendations ([https://ccnso.icann.org/sites/default/files/filefield\\_11060/idnc-wg-board-proposal-25jun08.pdf](https://ccnso.icann.org/sites/default/files/filefield_11060/idnc-wg-board-proposal-25jun08.pdf)) and as discussed in this module. The recommendations and their inherent limitations were arrived at through community consultations, as described in Module 10. The primary reasons for implementing limitations are that the process is experimental in nature and should not pre-empt the outcome of the ongoing IDN ccNSO Policy Development Process."

6. We note that ICANN Board Resolution 2020.01.26.03 (<https://www.icann.org/resources/board-material/resolutions-2020-01-26-en#1.c>) directs the ccNSO and GNSO to "take into account the Recommendations for the Technical Utilization of the RZ-LGR (<https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf>) while developing their respective policies," and that those Recommendations require the use of RZ-LGR to determine valid IDN TLDs and their variant labels.

7. Noting (3), (4), (5), and (6) above, we find that accepting the applied-for string as a valid TLD label would pre-empt ccNSO policy development pursuant to ICANN's IDN Program (<https://www.icann.org/resources/pages/idn-2012-02-25-en>) to develop Root Zone LGRs, and as such would present a threat to the stability of the DNS.

8. We find that the applied-for string satisfies the specific Technical String Requirements of section 3.5.1 of the FTIP.

9. Noting (8) above, we observe that the Technical String Criteria of section 3.5 of the FTIP are not limited to the Technical String Requirements of section 3.5.1: "Meeting all the technical string requirements in this section does not guarantee acceptance of a prospective top-level string, since the following subsections do

not contain an exhaustive list of all requirements or restrictions."

10. As a point of information only, we note that (U+A986 U+A9A4) is the first IDN ccTLD applied-for string that includes code points that are valid in IDNA2008 (which is based on Unicode version 6.3) but not valid in IDNA2003 (which was based on Unicode version 3.2, which does not include the Javanese script code points).

11. We find that the applied-for string associated with the application from the following country (a) presents a meaningful threat to the stability and security of the DNS by incorporating code points that are excluded from the Integration Panel's Maximal Starting Repertoire (MSR-4), and (b) presents an acceptably low risk of user confusion:

INDONESIA (U+A986 U+A9A4)

This string is therefore not approved by the Panel.