



Asia Pacific Top Level Domain Association

22 October 2009

Mr Rod Beckstrom
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United States of America

Dear Rod,

IDN ccTLD Fast Track Process

I refer to the captioned and would like to thank you for your letter on 6 October 2009.

On behalf of the ccTLD managers in the AP region, I would like to thank ICANN staff for their hard work in preparing the Proposed Final Implementation Plan for the IDN ccTLD Fast Track Process to be submitted to ICANN Board.

We learned from the Proposed Final Implementation Plan that, the annual fee for IDN ccTLD will be based on revenue generated by ccTLD managers from their respective IDNs. I would like to confirm with you that the said fee shall be a voluntary based contribution by the ccTLD managers. As pointed out in earlier correspondence, many ccTLD managers in the AP region are not-for-profit organisations endeavouring to serve their local communities. APTLD expects that after securing the relevant IDN, ccTLDs will provide the IDN as an obligation to meet the social needs of their population who are conversant with their own native language. Therefore ccTLD's will not likely generate additional revenue from the provision of IDN service; it is even envisaged that additional investment will be required by ccTLD managers on the administering of the new service. Hence, it is important for ICANN to reaffirm that the said annual contribution will be voluntary and at most on a cost recovery basis.

Regarding the possible requirements for IDN agreements between ICANN and ccTLD operators, we appreciate ICANN's vision on ensuring the technical stability of DNS in order to better serve the Internet community and end-users. ccTLD managers in the AP region certainly share such a vision. That is why ccTLD operators in the region have been managing their respective ccTLDs successfully and with high technical standard and stability, even without any formal agreement with ICANN. I would like to stress again that there is no legitimate reason for ICANN to require ccTLD managers to enter into written agreements with ICANN before they can operate their respective IDN ccTLDs. APTLD, however, sees agreements on a voluntary basis between ICANN and ccTLD managers as appropriate.

Again, variant strings must be delegated to the same IDN ccTLD manager who, for reasons of practicality and usability, should have the right to deploy both the normal and variant strings to meet the needs of the local Internet community. We appreciate ICANN's commitment to the stability of DNS and satisfaction of end-users upon the introduction of IDN ccTLDs. However, in view of the practicality and usability of the IDNs, variant strings must be delegated to the same IDN ccTLD manager for the new service to work seamlessly and ensure the end to end principles of the network. Any possible issues at the second and third levels caused by the use of variant strings at the top level can and should be left to the registries to resolve at a local level by technical solutions or by adopting appropriate policies.

APTLD

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I look forward to ICANN's resolution on the above mentioned issues. APTLD will reiterate our views in ICANN activities in Seoul and look forward to working further with Ms Tina Dam on IDN related matters.

May I wish you a successful meeting in Seoul.

Yours sincerely,



Jonathan Shea

Chair

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