



The role of public policy in promoting multilingualization of the Internet

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INTRODUCTION

ARTICLE 19 welcomes the efforts of the ITU to engage in a multistakeholder process by holding this Open Consultation of the Council Working Group on Internet-Related Public Policy Issues (CWG-Internet) on the role of public policy in promoting multilingualization of the Internet. We applaud the CCWG-Internet for its efforts to further the development of and strengthened cooperation among stakeholders to achieve multilingualization of the internet. We appreciate the opportunity to provide the Working Group with our position on the topic and look forward to the discussions that will follow. ARTICLE 19 is an international human rights organization that works to protect and promote the right to freedom of expression. With regional offices in East Africa, West Africa, South Asia, East Asia, Europe, Central America, South America, and MENA, we champion freedom of expression at the national, regional, and international levels. The work of ARTICLE 19's Digital Programme focuses on the nexus of human rights, Internet infrastructure, and Internet governance. We actively participate in forums across the Internet governance and standards landscape, including the Internet Corporation of Assigned Names and Numbers (ICANN), the Internet Engineering Task Force (IETF), the Institute of Electrical and Electronics Engineers (IEEE), and the Internet Governance Forum (IGF).

QUESTION 1

1. What could ITU and its members and other stakeholders do to ensure that the Internet becomes more multilingual in nature and thus accessible for more of the global population?

When it comes to multilingualization and making the internet more accessible to the global population, the ITU and its members have an integral role to play. Multilingualization of the internet is a key element of the ITU's work on meaningful connectivity and in achieving universal acceptance (UA), which both aid in achieving the UN's [Sustainable Development Goals](#) (SDG), and specifically SDG 9 "to build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation." Additionally, as laid out in [resolution 48](#) on "Internationalized (multilingual) domain names," the ITU has a responsibility to (1.1) promote the universal acceptance of internationalized domain names (IDNs); (1.2) raise awareness of this work and support in engaging stakeholders; and (1.3) build the capacity of stakeholders.

However, **we emphasize that this work must be undertaken in close collaboration with standards-developing organizations** specializing in the management of domain names - the Internet Corporation for Assigned Names and Numbers (ICANN) - and in the development of technical protocols to ensure the security and stability of the internet's architecture - the Internet Engineering Task Force (IETF), respectively. As outlined in ITU-T resolution 48, intergovernmental organizations have had, and should continue to have, a facilitating role in the coordination of Internet-related public policy issues. **We encourage the ITU to work collaboratively with intergovernmental and international organizations in their ongoing efforts to achieve this important goal.**

Our recommendations for ensuring that the internet becomes more multilingual in nature and thereby more accessible to the global population encompasses the following three categories of actions: (1.1) UA-readiness, (1.2) awareness-raising and (1.3) capacity-building.

1.1 Ensuring UA-readiness

Multilingualization allows anyone speaking any language to access the internet by ensuring that users can register a domain name, create an email address, open a social media account in their own language, etc. all while using their local script and language. UA-readiness refers to the process of making systems, software, and applications compatible with Universal Acceptance (UA) and is a prerequisite of making the internet ecosystem UA-ready.

To achieve UA-readiness, the ITU and Member States must take action at the following levels:

- **Technical level:** We recommend that the ITU and its member states focus its efforts on mobilizing software application developers to get their products UA-ready: This can be done by:
 - Providing support to software developers for interoperability testing as part of achieving UA-readiness for their product(s);
 - Organizing workshops or discussion sessions for relevant actors to discuss the technical challenges to achieving UA-readiness and multilingualization
 - Collaborating with working groups within other standards developing organizations (such as ICANN and the IETF) that are developing rules for IDNs across different scripts and protocols to ensure interoperability across browsers and applications, respectively.

- **Institutional level:** We recommend that the ITU ensure that Inter-institutional collaboration is at the forefront of its efforts to promote multilingualization of the internet. Examples of inter-institutional collaboration includes:
 - Within the ITU, the Development Sector (ITU-D) can work to promote initiatives like the annual UA Day, perhaps by coordinating events with other UN agencies, such as UNESCO, whose Internet Universality Indicators emphasise the importance of a multilingual Internet.
 - Within the UN, UNESCO has been a strong proponent of UA-readiness. We recommend the ITU collaborate with UNESCO in its efforts to ensure that all UN Member States are fully aware of issues arising from the development of IDNs and that they are engaged in the associated policy debate. UNESCO's [Internet Universality Indicators](#) can serve as a model for assessing the process of achieving multilingualization of the internet, particularly the indicators for "accessibility to all" that measure connectivity, equitable access to the internet, and the availability of local content and language.
 - ICANN's mandate is to ensure the Internet is stable, secure, and interoperable by coordinating the global systems of unique identifiers. We recommend the ITU provide support to ICANN in:
 - (1) developing and regularly publishing metrics for measuring adoption of universal acceptance;
 - (2) ensuring public disclosure of policies available to ensure the successful adoption of UA across all ccTLDs, registries and registrars;
 - (3) supporting the development of [Root Zone Label Generation Rules](#)

[\(RZ-LGR\)](#), a mechanism to integrate new scripts while ensuring the stability and security of the DNS ecosystem;

- (4) developing operational mechanisms that ensure elements of the internet work well together thereby ensuring stability and Integrity of the DNS; and
 - (5) developing Second-Level Reference Label Generation Rules, which TLD registry operators use when they develop the rules for IDN registration under their TLDs.
- **Political / Regulatory level:** To promote UA-readiness, we recommend that the ITU provide the space for member states to discuss and coordinate on policy solutions to promote UA-readiness within the international, regional, and national contexts such as through workshops and collaborative events. A bottom-up approach that meaningfully integrates the input of a variety of stakeholder groups - including civil society - is integral to achieving UA-readiness, particularly at the local level, and facilitating dialogue will help ensure an exchange of best practices and the seamless integration of IDNs.
 - **End-user level:** This is where we recommend the ITU and its member states focus the bulk of its efforts. Below, we outline our recommendations for awareness-raising and capacity-building.

1.2 Awareness-raising

An integral element for achieving multilingualization and meaningful connectivity is through the promotion of universal acceptance (UA) of internationalized domain names (IDNs) among end-users. This work is closely tied to capacity-building (outlined below). Our recommendation for awareness-raising actions the ITU could take include **supporting the organisation of national and local-level UA awareness-raising events** - particularly around UA day and organizing workshops and spaces for dialogue across stakeholders to discuss the benefits and challenges of achieving UA readiness.

1.3 Capacity-building

Capacity-building will vary depending on the target audience. We therefore provide a set of recommendations by sector, focusing on the following groups: the **private sector, policymakers, and the end-user.**

- **Private sector:** For capacity-building targeting the private sector, the aim is to ensure website and email applications are compatible with all top-level domains regardless of script. The ITU can lead on this by organizing workshops to encourage discussion on the technical requirements for achieving UA-readiness, the financial benefits of doing so, and the benefits for their customers.
- **Policymakers:** For capacity-building targeting policymakers, it is important for ITU member states to tailor their efforts to the local and regional context. The ITU can lead in developing and disseminating resources and briefing materials on the financial, societal, and technological benefits of achieving universal acceptance of IDNs, and collaborate with member states on country-specific case studies and local capacity-building initiatives. Local initiatives can focus on developing policies for utilizing IDN domains, discussing policy and technical solutions to ensure email

systems in the local script interoperate with the broader internet ecosystem, and collaborating with registries and registrars to distribute free or low-cost IDNs to local businesses or organizations.

- **End-user:** For capacity-building target end-users, we recommend that the ITU and its member states closely coordinate with other institutional actors (such as ICANN and UNESCO), to support ongoing efforts. End-user capacity-building will also entail close collaboration with local universities and civil society organizations to provide the necessary training and information to incentivize people to register IDNs and understand how to use them.

QUESTION 2

2. What are the benefits and challenges of multilingualization of the Internet, including through universal acceptance of Internationalized Domain Names (IDNs), or the lack thereof, in terms of technical, economic, security, cultural and capacity-building?

2.1 Benefits to Multilingualization of the Internet

2.1.1 Multilingualism as a means of achieving broader UN goals

- With regards to the SDGs, one of the proposed targets in [Goal 9](#), which concerns infrastructure, industrialization and innovation, calls for significantly increased access to information and communications technology and universal and affordable access to the Internet in least developed countries by 2020. Fulfilling this target will be instrumental in addressing many other Goals and targets, including [target 17.8](#) on strengthening the means of implementation and revitalizing the global partnership for sustainable development.
- Connectivity and access for all are crucial to the Internet's contribution to sustainable development, with the Internet being a critical enabler of the UN's goal to achieve sustainable digital transformation by 2030 as per the [ITU's "Connect 2030"](#) agenda. The agenda's target 2.4 to ensure "All digital gaps – particularly gender, age, and urban/rural – to be bridged" will also benefit from multilingualization of the internet, which overcomes linguistic barriers to internet access.

2.1.2 Multilingualism & the Protection of Cultural Heritage

- As the majority of the world does not speak English as a first language or use American Standard Code for Information Interchange (ASCII) characters, IDNs enable people around the world to use domain names in local languages and scripts such as Arabic, Chinese, Cyrillic, etc. Multilingualism on the internet will also serve to protect indigenous languages.

2.1.3 Multilingualism and Freedom of Expression (FoE)

- The free and fair use of domain names through new gTLD's enable communities and organisations to express their affiliations through their domain names such as .gay or .community, and therefore facilitate FoE. IDNs further promote multilingual participation on the Internet through the inclusion of native languages and scripts as part of domain names, ensuring communities can express themselves through their domain name in native scripts.

2.1.4 Economic and Social benefits

- A multilingual Internet facilitates users' ability to access and connect to ecommerce,

local communities, and governments, as well as to embrace and proliferate cultural traditions through language.

2.1.5 Multilingualism and Access to Information

- Users, particularly the poor and marginalized, need content that is relevant to their developmental needs, in languages they understand, accessible through devices and applications that are affordable and easy to use. ISOC has published a [report](#) with OECD and UNESCO demonstrating that local content, Internet development and lower access prices reinforce one another and achieve development gains. Multilingualism facilitates the development of and access to local content.

2.2 Challenges of a Multilingual Internet

2.2.1 Technical challenges

- UA as a technical best practice works to ensure that all domain names and email addresses – in any language, script or character length – are accepted equally by all Internet-enabled applications, devices and systems. However, currently, only about 11% of the top 1,000 global websites can accept internationalized email addresses and only 22.2% of email servers support them. For example, big browsers such as Safari need to ensure that updates are compatible with supporting characters in other languages.
- Such technical challenges also come with security and authenticity challenges, such as how to ensure safety and authenticity when sending emails from one IDN to another?
- Linguistic complexity also adds to the technical challenge: for example, Arabic script contains many languages beyond just Arabic; and even w/in the Arabic language, the meaning behind each letter can vary. Variance is also a challenge: in English you have Google vs google, which is easily handled, but the number of variants in other scripts can be much larger. This requires the development of technical solutions to minimize the number of variants.

2.2.2 Capacity-building challenges

- Even once technical challenges have been addressed and IDNs are in place, there is the additional challenge of ensuring that users are aware and take advantage of this capability. **A lack of awareness of IDNs and their potential benefits is one of the biggest challenges for achieving a multilingual internet.** Users require skills to make full use of Internet-enabled services, including basic and ICT literacy, and skills in using devices and applications. ICT-specific skills in areas such as local infrastructure and traffic management, computer networking, web design, applications development and Internet security are needed in all societies.
- Policymakers also need to understand technical aspects of the Internet, the pace of change in Internet-enabled services, and the interaction between these and public policy domains.

2.2.3. Institutional Challenges

- Given the number of standard development bodies, UN agencies, and member states involved, there will be institutional challenges for coordination in implementing UA and achieving a multilingual internet. There are also high costs for businesses to update their systems to be UA-ready, which will need to be addressed