

Brussels, Belgium
17 January 2019

Comments to Work Track 5 on Geographic Names at the Top Level - Supplemental Initial Report of the New gTLD Subsequent Procedures Policy Development Process

On behalf of CENTR, we would like to thank you for the opportunity to comment on the above-mentioned supplemental report and to offer the comments below. CENTR is the association of European country code top-level domain (ccTLD) registries.

The below comments are restricted to the recommendations, questions and proposals applicable for country and territory names.

1. General Comments

The rules applicable to geonames as TLDs in the Applicant Guidebook 2012 (AGB) generally worked well and struck the appropriate balance between the different interests at stake. It was the result of a long process with discussion between the different stakeholders. Even if the treatment of geographical names in the AGB was different from the New Generic Top-Level Domains policy recommendations from 8 August 2007, the AGB served the community well. We believe that if the 2007 policy had been implemented instead, we would not have avoided conflicts regarding geographical names. On the contrary, we would possibly have had even more conflicts. Therefore, the rules of the AGB should be maintained, with a few clarifications.

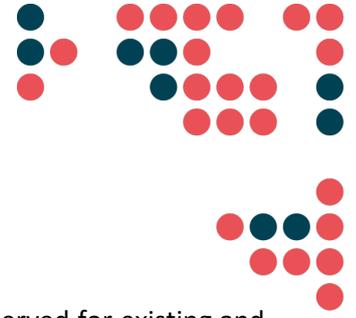
2. Specific comments to the Preliminary Recommendations

Preliminary Recommendation #1: Supported without further comments.

Preliminary Recommendations ##2-9 (strings at the top level reserved as not available for delegation in the AGB): The exclusion of country names and variations thereof is consistent with the fact that such names are not “generic” names and should therefore not be applicable as gTLDs. If used at all, they should be under the policy authority of the respective national communities, similarly to ccTLDs.

Preliminary Recommendation #2: Supported.

All 2-character combinations, on ISO 3166-1 or not, should be reserved for ccTLDs. ICANN is not in the position to decide what is a country and what is not. There have been and will be new countries in the



future that will need a ccTLD. Therefore all 2-character combinations should be reserved for existing and future ccTLDs.

However, the proposal by Work Track 2 to remove the reservation of 1 letter/1 digit is in conflict with the principles that gTLDs should be 3-characters or more and will increase string confusion with the 2-letter country codes. Furthermore, we would like to reiterate our previous comment:

CENTR members insist that the reservation of 2-character strings consisting of one letter and one digit (and vice versa) should be firmly kept as it is. There would be a high risk of confusion in case this reservation were to be lifted, due to the association between two-character top-level domains and ccTLDs (ISO 3166-1 Alpha-2).

Furthermore, there is a direct threat of respective homonyms amongst possible two-character gTLDs consisting of one digit and one letter, that might be confused with existing ccTLDs. This will significantly increase the number of security risks, including phishing and confusion amongst consumers. For example:

.fi -> .f1

.si -> .s1

.fo -> .f0

.sl -> .s1

.ro -> .r0

.is -> .1s

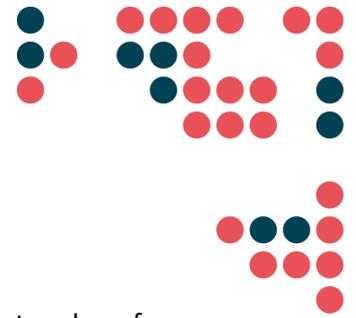
.nl -> .n1

Therefore, CENTR members are calling for the highest level of caution when it comes to the proposal to introduce two-character gTLDs consisting of one letter and one digit, to ensure the stability of the DNS.

Preliminary Recommendation #3: Supported. Alpha-3 codes in the ISO 3166-1 standard are of great importance for countries and are used widely as identification for the country. The reservation of these strings should be kept as in AGB 2012; that is, they must remain unavailable for delegation at the top level.

Preliminary Recommendation #4: We support the proposal to continue reserving long-form names (of countries and territories) in the ISO 3166-1 standard at the top level, keeping them unavailable for delegation.

Preliminary Recommendation #5: We support the proposal to continue reserving short-form names (of countries and territories) in the ISO 3166-1 standard at the top level, keeping them unavailable for delegation.



Preliminary Recommendation #6: We support the proposal to continue reserving short- or long-form name associations with a code that has been designated as “exceptionally reserved” by the ISO 3166 Maintenance Agency at the top level, keeping them unavailable for delegation.

Preliminary Recommendation #7: We support the proposal to continue reserving separable components of a country name designated on the “Separable Country Names List” at the top level, keeping them unavailable for delegation.

Preliminary Recommendation #8: We support the proposal to continue reserving permutations or transpositions of any of the names included in Preliminary Recommendations #4 - #7 at the top level and keeping them unavailable for delegation. We also support the clarification on the Alpha-3 codes listed in the ISO 3166-1 standard, where strings resulting from permutations and transpositions of those should be allowed, as they will then constitute general words.

Preliminary Recommendation #9: We support the proposal to continue reserving names by which a country is commonly known, as described at the top level and keeping them unavailable for delegation.

3. Questions on which the PDP WG is seeking feedback

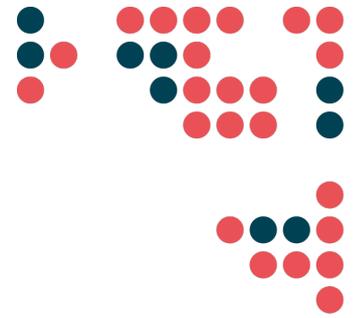
E4: Regarding ruling principles, we agree that the program should allow for the introduction of new gTLDs. However, this does not mean that ALL names should be allowed.

It is important, as mentioned in the principles, that the predictability for all parties is enhanced. We should try to obtain a process that reduces the likelihood of conflicts both during the application process and afterwards and we should aim to make the policy and process as simple as possible.

E6: Ideally country and territory names in all languages should be protected. As far as we know, no reports have been presented on problems in the 2012 round. If limited at all, our suggestion is to at least reserve translations in UN languages as unavailable, the official languages of the country for long-form names in the ISO 3166-1 standard, short-form names listed in the ISO 3166-1 standard and separable components of country names designated on the “Separable Country Names List”. In this way, we have a list to relate to.

In addition, a curative process should be in place, such as an objection procedure for commonly used languages in the country in question.

E7: The suggestion from some Work Track members to start a process to delegate 3-letter codes and/or country and territory names to specific parties, such as relevant governments and public authorities or other entities, does not belong in Work Track 5 or in the New gTLD Process at all. The only recommendation that could be made is to suggest a change in the bylaws to establish a new category for these strings. They are not ccTLDs, as they are more than 2 letters, but they should not be gTLDs either, as they have the strong connection with countries. If used at all, they should be under the policy authority of the respective national communities, similarly to ccTLDs. A process to study the possibilities here should be left for a later stage, after the New gTLD Policy for the next round has been finished.



4. Proposals

f.1.2.5 – the purpose of future policy development and implementation

- Proposal 1: Supported

f.2.2.2 – Alpha-3 code listed in the ISO 3166-1 standard

- Proposal 11: Not supported
- Proposal 12: Not supported
- Proposal 13: Not supported

f.2.2.6 – permutations or transpositions

- Proposal 14: Not supported

f.2.2.7 – commonly known names on countries

- Proposal 15: Supported, and a geographic names panel should help
- Proposal 16: Supported