



New gTLDs – Draft Applicant Guidebook Version 4, published 31.5.10

Comments from UNINETT Norid AS on the treatment of country/territory names in the new gTLD process (Module 2)

UNINETT Norid AS, the registry for the Norwegian ccTLD .no, thanks ICANN for the opportunity to give input on the Draft Applicant Guidebook Version 4. We are aware of the difficulties ICANN face when trying to bring together the various views from the many constituencies in a balanced manner. Therefore, we want to thank you again for your work in the positive evolution of the DAG.

We are pleased to see the change in regards to country and territory names, and fully support taking them out of the new gTLD program. We note that the first paragraph of 2.1.1.4.1 Treatment of Country or Territory Names makes these names unavailable under the new gTLD Program in *this application round*, but that the footnote states that these will be handled through a ccPDP. We assume that although the DAG states "this application round" that the country and territory names will be left out of the gTLD program until the process of deciding what should be done with them has been concluded through a ccPDP. Reintroducing the names as gTLDs before the ccPDP has finished would be in direct opposition to the earlier advice of the GAC and the ccNSO.

We would like to reiterate our skepticism for the use of lists to define which strings should be regarded country and territory names, instead of including all "meaningful representation and abbreviations". We understand that this is a compromise solution based on the need to have a clear definition for both the applicants and for ICANN, but the use of lists mean that great care must be taken in order to not leave something out, something that the current DAG demonstrates.

Point 3.2 in Module 2 the DAG 4, under the chapter on String Review, Part III, introduces the possibility of having 2 character IDN gTLDs, as opposed to a requirement for minimum 3 characters in ASCII. We expect that the reason for this is because some language/script combinations (like Chinese) have characters that are entire words, and so limiting them to "three-word TLDs" doesn't make any sense. This is quite understandable, but we are afraid that the protection of the two-letter ccTLD codes, as an abbreviation of the country or territory name in quite a lot of languages has been left out, perhaps unintentionally. We notice that *some* protection has been given to strings in three scripts in 3.2.2, but not to any other script:

"Two-character strings that consist of Unicode code points in scripts such as the Latin, Greek, and Cyrillic script blocks are intrinsically confusable with currently defined or potential future country code TLD(ccTLD) strings based on the ISO

3166-1 alpha-2 codes. Therefore, a very conservative standard is used to assess applied-for strings that consist of two Greek, Cyrillic, or Latin characters: a default presumption of confusability to which exceptions may be made in specific cases."

We interpret the text to mean that had it not already been registered, an application for .ppf as a gTLD would have been processed under a default presumption of confusability, but might have been registered as a gTLD in exceptional cases. There would have been no requirement for government support or non-objection for such an application. An application of .中国 (.china) or ".no in Chinese" as gTLDs would pass without any restrictions (provided they were not already registered).

Is this result a conscious policy decision, or a result of not updating the definition for country and territory names when introducing two-character gTLDs? Is the intention to protect only Latin, Greek and Cyrillic, and not for example Arabic, Chinese, Japanese etc? We would like to emphasize the need for protection to avoid that the translation of the two-letter ccTLD codes in other languages can be taken as gTLDs, and believe that in order to properly protect the alpha-2 country codes in all languages it might be better to add a new bullet in the list in 2.2.1.4.1 on Geographical Names of strings that shall be considered a country or territory name.

Our suggested added text (after "A string shall be considered to be a country or territory name if:" as a new bullet point i) would be:

- i. it is an alpha-2 code listed in the ISO 3166-1 standard, or a translation of the code in any language.

We would like to support the way you have solved the problem of what to do if a registry of a geographic gTLD breaches the criteria under which the support or non-objection of the government was given. The mechanisms of recourse in the event that a government or public authority withdraws this support for a geographic gTLD described in the Explanatory Memorandum "Withdrawal of Government Support for Registry – Post delegation options" of 4th June 2010, seem adequate to us.

We assume that these precautions will be included both in the final applicant guidebook and that the arrangement also will be a part of the New gTLD Registry Agreement with ICANN.

Regards,
UNINETT Norid AS