

8 October 2025

To: Tomslin Samme-Nlar
 Nacho Amadoz
 Interim Co-Chairs, GNSO Council



RE: ALAC Position on the Protection of IGO/INGO Identifiers

Dear Tomslin and Nacho,

The At-Large Advisory Committee (ALAC) wishes to convey the following to the GNSO Council.

The ALAC had during the [At-Large Consolidated Policy Working Group \(CPWG\) call of 24 September 2025](#), and again, briefly on the [CPWG call of 8 October 2025](#), discussed the applicability of String Similarity Review in the Next Round of the New gTLD Program, in particular, regarding the issue of the protection of the Red Cross/Red Crescent Movement identifiers, the International Olympic Committee Identifiers, and the identifiers of the International Governmental Organizations, as recommended in the [Final Report on the Protection of IGO and INGO Identifiers in All gTLDs Policy Development Process](#) (IGO-INGO PDP Final Report) of 10 November 2013 (collectively referred to herein as “**IGO/INGO Identifiers**”), and as proposed to be implemented by ICANN org.

In the discussions, the ALAC considered input from a number of sources:-

1. A [summary](#) of the Subsequent Procedures Implementation Review Team (SubPro IRT) deliberations on this issue;
2. The “String Similarity Assessment of Reserved Names” [paper](#) of 10 September 2025 prepared by the ICANN Org for discussion of this issue with the SubPro IRT, which suggested two options for a way forward;
3. The relevant policy recommendations from the IGO-INGO PDP [Final Report](#) of 10 November 2013;
4. The 16 September 2025 [letter](#) from the ICANN Board Chair to the Interim Co-Chairs of the GNSO Council on this issue;
5. The [email](#) from Brian Beckham, WIPO of 1 October 2025, in response to the 16 September 2025 letter mentioned above; and
6. A review of the [presentation](#) on this issue, prepared for the GNSO Council Extraordinary Meeting of 9 October 2025.

The ALAC’s Position

In view of the *diametrically opposing implications* of the two options put forward by ICANN org, **the ALAC fully supports Option 2 of including the IGO/INGO Identifiers in String Similarity Review**, i.e. the position originally proposed by ICANN org staff responsible for implementing the Next Round, which we note is not only supported by some members of the SubPro IRT, but also preferred by the ICANN Board and considered by spokesperson for the GAC’s IGO/INGOs group as the correct and appropriate implementation of applicable adopted policy recommendations.

In supporting Option 2, the ALAC places predominance on the following:

Firstly, the ALAC recognizes and supports the role of the String Similarity Review (SSR) in helping to mitigate unacceptable risk of end-user confusion and loss of confidence in the DNS due to visually confusingly similar strings being delegated into the Root Zone. This goal should neither be taken lightly nor undermined. Given the status and functions of those IGOs/INGOs in globally advocating for issues and people outside of government, allowing a third party applicant to potentially secure a string that is confusingly similar to a protected IGO/INGO Identifier would not serve the public interest, as it is conceivable that this could lead to bad actors exploiting end-user confusion vulnerabilities to perpetrate harm “in the name of an IGO/INGO”. The proposed implementation of the Next Round SSR by way of Option 2 upholds the twin goals of mitigating end-user confusion and loss of confidence in the DNS, and giving reasonable protection for those IGO/INGO Identifiers.

Secondly, the ALAC views the inclusion of IGO/INGO Identifiers in SSR, per Option 2, not as an ‘expansion of rights beyond those exact matches of those IGO/INGO Identifiers’ but as the appropriate mechanism to preserve the ability for an IGO/INGO to apply for its relevant identifier if and when it chooses to, as was intended by the relevant policy recommendations from the IGO-INGO PDP.

It is inconceivable to the ALAC that policy which exists to protect those IGO/INGO Identifiers for application by their respective IGO/INGO could be displaced by an unreasonably strict interpretation of policy recommendation text or absence of specific policy recommendation text said to be required in order to allow implementation by way of Option 2. No policy recommendation exists to suggest that the ability for an IGO/INGO to apply for its protected IGO/INGO Identifier would be encumbered or blocked by a confusingly similar string; or that an IGO/INGO must promptly apply for its IGO/INGO Identifier in order to avoid being blocked by a confusingly similar string/TLD in the next round or future application opportunities.

Therefore, the ALAC urges the GNSO Council to place public interest considerations towards the mitigation of risk of end-user confusion and loss of confidence in the DNS above the call for the strict interpretation of policy recommendation text expressed in Option 1.

The ALAC would also be supportive of the Third Resolved Clause Option wherein the GNSO Council agrees to instruct the SubPro IRT to refer the issue to the ICANN Board for a decision.

Sincerely,

Justine Chew

ALAC Liaison to the GNSO