

String Similarity Assessment of Reserved Names

Version 2: Prepared for Discussion with the SubPro Implementation Review Team
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Background

- **String similarity evaluation is conducted to make sure that two confusingly similar strings are not both delegated into the Root Zone, with “[t]he objective ... to prevent user confusion and loss of confidence in the DNS resulting from delegation of many similar strings”, as noted in [2012 AGB](#), section 2.2.1.1.**
- In the 2012 new gTLD round, the AGB required checking for string similarity with existing TLDs, *Reserved Names* (e.g., ICANN, IANA, called Top-Level Reserved Names List), one- or two-char ASCII, and applied-for strings.
 - The Reserved Names from 2012 round are referred to as Blocked Names in the [2026 new gTLD round AGB](#) (public comment version).
- In the 2012 gTLD round, the AGB included the category *Strings Ineligible for Delegation* (e.g., RedCross, Olympic) which listed strings that were not allowed for application and delegation. The AGB further noted that future application rounds may differ according to consideration of further policy advice.
 - The Strings Ineligible for Delegation from the 2012 round are referred to as Reserved Names in [2026 new gTLD round AGB](#) (public comment version).
- SubPro defers to a separate policy for consideration of the top-level protections of International Governmental Organizations (IGOs), International Olympic Committee (IOC), and International Non-Governmental Organizations (INGOs), and RCRC Movement (Red Cross). This work was done under the Protection of IGO and INGO Identifiers in All gTLDs Policy Development Process.
- Based on the IGO and INGO Identifiers policy, the [2026 new gTLD round AGB](#) (public comment version; section 6.2.2.2.1) notes that “the exception process provides a limited opportunity for applicants to request names from the Reserved Names list, including any allocatable variant strings.”

Issue

In the 2012 new gTLD round, strings such as RedCross, Olympic, etc. were not eligible for application and delegation, and not considered for string similarity. For the 2026 round, the relevant organizations are now able to apply for these strings and their variant strings for delegation based on a separate policy (i.e., these strings are *no longer ineligible* for delegation). SubPro Policy maintains that applied-for strings should undergo string similarity evaluation to prevent user confusion, without granting any exceptions.

However, it is not clear how these Reserved Names (as defined above) for the 2026 round should be treated in String Similarity Evaluation, given they were excluded from this evaluation in the 2012 round because they could not be applied for in the 2012 round.

Examples

See below for possible examples of strings which could be similar to each other. The strings in the examples are all valid but not variant labels under the Root Zone Label Generation Rules (RZ-LGR).

Reserved Names	redcross, olympic, etc.
Possible non-reserved applied-for strings	ṙedcross, ɔlympic, etc.
Underlined versions of the strings (which may cause significant user confusion)	<u>redcross</u> , <u>olympic</u> , <u>ṙedcross</u> , <u>ɔlympic</u> , etc.

Note: Underlining, uppercase forms, etc. are being considered in the string similarity evaluation process, as discussed in more detail in [String Similarity Review Guidelines](#).

Options for a Way Forward

1. **Option 1: Reserved Names are only protected based on who can apply for them, but go through String Similarity Evaluation like any other applied-for string if it is applied-for.**
 - a. Only entities for which Reserved Names are reserved for can apply for them, based on the process noted in AGB.
 - b. Reserved Names will not be given any protection against similar strings, i.e.:
 - i. If redcross and ṙedcross are both applied for, they will be put in contention set and any one of these could move forward based on which way contention is resolved.
 - ii. If redcross is not applied for in the current round, and ṙedcross is applied for, then ṙedcross can proceed based on first-come-first-served basis.
 1. If ṙedcross is delegated, redcross cannot be delegated in subsequent rounds, as it will be found confusingly similar to ṙedcross.

2. **Option 2: Reserved Names are protected based on who can apply for them, and also protected against other applied-for strings which are found confusingly similar during String Similarity Evaluation, as explained below.**
 - a. Only entities for which Reserved Names are reserved for can apply for them, based on the process noted in AGB.
 - b. Reserved Names will be given protection against similar strings, i.e.:

- i. If redcross and redcross are both applied for, redcross will be able to proceed but redcross will not be able to proceed. They will not be put in a contention set.
- ii. If redcross is not applied for in the current round, and redcross is applied for, then redcross cannot proceed due to the protection for redcross during string similarity evaluation.
 - 1. The string redcross can be applied for (by an eligible organization) and delegated in subsequent rounds as no similar string can be delegated.

In summary, here are the options presented above:

#	Summary	Pros/Cons	Possible Outcomes
1	Reserved Name protected by only who can apply, but undergoes string similarity evaluation with other strings without any protection (on first-come-first-served)	Reserved Name may not be delegated if it is found similar to another applied-for string and it does not win the contention process, or if a similar string is applied in 2026 round and the Reserved Name is applied in a subsequent round.	Only one of redcross or redcross can be delegated
2	Reserved Name protected by who can apply and protected in string similarity evaluation	Reserved Name can be applied for during any round and will not be hindered from delegation based on string similarity evaluation because any similar string to Reserved Name cannot proceed and so cannot be delegated at any time.	Only redcross can be delegated, redcross cannot be delegated

In the absence of clear policy on this specific case in SubPro, IDN EPDP Phase 1, and IGO and INGO Identifiers Protection Policy and based on remaining recommendations in SubPro and IDN EPDP Phase 1, **ICANN proposes to move forward with option 2, as it protects any potential abuse of the protected Reserved Names in 2026 AGB which could be done by registrations under similar gTLD strings.**

ICANN seeks IRT input on this matter to finalize the AGB language.

Note

The IRT also discussed whether Reserved Names could be protected based on who can apply for them, but would not be considered for string similarity evaluation like other applied-for strings. *ICANN, however, found this approach infeasible as it would create security issues for end users, and undermine the policy’s intent for string similarity evaluation.*

- a. Only entities for which Reserved Names are reserved for can apply for them, based on the process noted in AGB.
- b. They are not considered for string similarity evaluation, i.e.:

- i. If redcross and redcross are both applied for, they will not be put in contention set, because redcross is not considered in string similarity evaluation, and both of these could move forward.
- ii. If redcross is not applied for in the current round, and redcross is applied for, then redcross can proceed as it is not compared with redcross for string similarity.
 - 1. If redcross is delegated, redcross can still be delegated in subsequent rounds because it is not considered for string similarity evaluation.

Annex: Relevant Recommendations

Recommendations from the Subsequent Procedures PDP WG:

- Affirmation 24.1 of [SubPro](#) states that:

The Working Group affirms Recommendation 2 from the 2007 policy, which states “Strings must not be confusingly similar to an existing top-level domain or a Reserved Name.”

- Affirmation 24.2 of [SubPro](#) states that:

Subject to the recommendations below, the Working Group affirms the standard used in the String Similarity Review from the 2012 round to determine whether an applied-for string is “similar” to any existing TLD, any other applied-for strings, Reserved Names, and in the case of 2-character IDNs, any single character or any 2-character ASCII string. According to Section 2.2.1 of the 2012 Applicant Guidebook, “similar” means “strings so similar that they create a probability of user confusion if more than one of the strings is delegated into the root zone.”...

- At the end of section 22.1 SuPro notes:

Adopted policy recommendations from a separate Working Group regarding the top-level protections of International Governmental Organizations (IGOs), International Olympic Committee (IOC), and International Non-Governmental Organizations (INGOs), and RCRC Movement (Red Cross) will be integrated into the Applicant Guidebook.

- [Applicant Guidebook for the new gTLD 2012 round](#), in section 2.2.1.1 notes the underlying motivation for string similarity review:

The objective of this review is to prevent user confusion and loss of confidence in the DNS resulting from delegation of many similar strings.

- It is further explained in section 2.2.1.1.1 that:

All applied-for gTLD strings will be reviewed against one another to identify any similar strings. In performing this review, the String Similarity Panel will create contention sets that may be used in later stages of evaluation.

- The next section 2.2.1.1 on Reserved Names and Other Unavailable Strings notes that:

Certain names are not available as gTLD strings, as detailed in this section.

- Its sub-section 2.2.1.2.3 Strings Ineligible for Delegation says that:

The following names are prohibited from delegation as gTLDs in the initial application round. Future application rounds may differ according to consideration of further policy advice.

These names are not being placed on the Top-Level Reserved Names List, and thus are not part of the string similarity review conducted for names on that list. Refer to subsection 2.2.1.1: where applied-for gTLD strings are reviewed for similarity to existing TLDs and reserved names, the strings listed in this section are not reserved names and accordingly are not incorporated into this review.

Applications for names appearing on the list included in this section will not be approved.

Recommendations from the PDP Protection of IGO and INGO Identifiers in All gTLDs:

- Recommendation 3.1.1:

Top-Level protections of Exact Match, Full Name Scope 1 identifiers of the Red Cross Red Crescent Movement are placed in the Applicant Guidebook section 2.2.1.2.3, Strings “Ineligible for Delegation”.

- Recommendation 3.1.2:

For Red Cross Red Crescent Movement identifiers, if placed in the Applicant Guidebook as ineligible for delegation at the Top-Level, an exception procedure should be created for cases where a protected organization wishes to apply for their protected string at the Top-Level.

- Recommendation 3.2.1:

Top-Level protections of Exact Match, Full Name Scope 1 identifiers of the International Olympic Committee are placed in the Applicant Guidebook section 2.2.1.2.3, Strings “Ineligible for Delegation”.

- Recommendation 3.2.2:

For International Olympic Committee Identifiers, if placed in the Applicant Guidebook as ineligible for delegation at the Top-Level, an exception procedure should be created for cases where a protected organization wishes to apply for their protected string at the Top-Level.

- Recommendation 3.3.1:

Top-Level protections of Exact Match, Full Name Scope 1 identifiers of the International Governmental Organizations are placed in the Applicant Guidebook section 2.2.1.2.3, Strings “Ineligible for Delegation”.

- Recommendation 3.3.2:

For International Governmental Organizations Identifiers, if placed in the Applicant Guidebook as ineligible for delegation at the Top-Level, an exception procedure should be created for cases where a protected organization wishes to apply for their protected string at the Top-Level.

Recommendations from the IDN EPDP Phase 1:

- In its section 4.4, the [IDN EPDP Phase 1](#) adds that:

4.4.1 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to an existing gTLD, an existing ccTLD, a New gTLD Program Reserved Name, a two-character ASCII string, or any of the variant label(s) of the aforementioned categories of strings, the entire variant label set of the applied-for primary gTLD string will be ineligible to proceed in the application process; or

4.4.2 If an applied-for primary gTLD string or any of its variant label(s) is confusingly similar to another applied-for primary gTLD string or any of its variant label(s), the entire variant label sets of the two applied-for primary gTLD strings will be placed in a contention set. Upon the resolution of the contention set, the application that prevails can proceed to the next stage of the application process.