

## Registries Stakeholder Group Statement

Issue: **Interim Paper Cross-Community Working Group on Use of Names of Countries and Territories as Top Level Domains (CWG-UCTN).**

Date statement submitted: **April 21, 2017**

Reference URL: <https://www.icann.org/public-comments/cwg-uctn-interim-paper-2017-02-24-en>

### Background

- The CWG-UCTN was chartered to:
  - Review the current status of country and territory names under current ICANN policies, guidelines and procedures;
  - Provide advice regarding the feasibility of a consistent and uniform definitional framework applicable across the SO's and AC's;
  - Should such a framework be deemed feasible, provide detailed advice as to the content of the framework.
- The CWG-UCTN Interim Paper Conclusions:
  - Throughout the CWG's deliberations the complexity and divergence of views increased;
  - The CWG's limited mandate overlaps with other with other community efforts;
  - Continuing the work of the CWG is not conducive to achieving a harmonized framework.
  - The CWG could not agree on a recommended course on how to organize future work, therefore the interim report contains the three alternatives that were discussed by the WG.

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### RySG Comment

The Registries Stakeholder Group (RySG) welcomes the opportunity to comment on the Interim paper of the Cross-Community Working Group on the Use of Names of Countries and Territories as Top Level Domains.

The RySG acknowledges the preliminary recommendation within the CWG, to maintain the existing ICANN policy of reserving 2-letter codes for ccTLDs.

The RySG strongly opposes any policy of reserving 3-character codes and is of the opinion that all 3-character codes (ASCII as well as IDN) should be eligible for the use as gTLDs, regardless of whether they are listed as alpha-3 codes on the ISO 3166-1 list.

There are no valid reasons that justify a policy of reserving 3-letter codes:

- There is no basis for countries or country-code operators to claim sovereignty or ownership rights over 3-character codes.
- Using 3 characters or more for gTLDs and reserving 2 characters for ccTLDs is consistent with current practice since the inception of the domain name system.
- There exist several 3-character gTLDs while there are no examples of 3-character strings that are used as a ccTLD. Reserving 3-character strings for use as ccTLDs risks creating confusion with the existing system wherein two-character codes are used as ccTLDs.

The RySG shared these arguments with the CWG in its submission to the 2015 survey. Only in a limited number of cases where international law, or other agreed-upon restrictions dictate an exception, should a restriction on the use of a particular 3-character string for a gTLD be allowed (for example as for the use of “www”).

The CWG concludes in its Interim Paper that due to the complexity of the issues around the use of geographic names and the overlap of the CWG’s work with other community efforts, a continuation of its activities would not lead to achieving a harmonized framework for the use of country and territory names as TLDs. The RySG supports the recommendation to close the current CWG.

With regard to the question what approach further work should take, the RySG is concerned that further work on geographic names should not delay the preparations of the next and subsequent rounds. The New gTLD Subsequent Procedures PDP is the appropriate mechanism to consider and provide (a) policy recommendation(s) related to the replacement of Section 2.2.1.4.1 of the 2012 Applicant Guidebook that made country and territory names and 3166 Alpha 3 codes “ineligible” for the 2012 round. The New gTLD Subsequent Procedures PDP is already underway and these issues already fall within the scope of its Charter<sup>1</sup>. All members of the community are eligible to participate in the Subsequent Procedures PDP working group, however we believe that there would be merit in convening a separate work track so that those who may have an interest only in this issue, and not in the wider scope of the work of the PDP, may participate more conveniently.

We recognize the interest of the ccNSO and the GAC in this matter and we encourage their participation in the Subsequent Procedures PDP WG. We believe this approach to be aligned with each of the alternative recommendations (Alternatives A, B and C) proposed by the CWG.

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<sup>1</sup> The New gTLD Subsequent Procedures PDP Working Group Charter states as part of the WG’s Mission and Scope: “Reserved Names: Review the composition of the reserved names list to determine if additions, modifications, or subtractions are needed (e.g., single letter, two letters, special characters, etc.). Evaluate if the implementation matched expectations (e.g., recommendations of the Reserved Names Working Group). Review whether geographic names requirements are appropriate.

Note, the GNSO/ccNSO-chartered Cross Community Working Group on the Use of Country and Territory Names as Top-Level Domains is focused on a policy framework for country and territory names and efforts should be made to avoid duplicative work. In addition, capital city names, city names, etc. may also warrant discussion.”