

Registries Stakeholder Group – Registrar Stakeholder Group

Issue: **Initial Report on the Protections for Certain Red Cross Names in all gTLDs Policy Amendment Process**

Date statement submitted: **31 July 2018**

Reference URL: <https://www.icann.org/public-comments/red-cross-protection-initial-2018-06-21-en>

Background¹

The purpose of the Initial Recommendations Report is to document the deliberations of the Reconvened GNSO Working Group for Protections for Certain Red Cross Names in All Generic Top Level Domains, and request public comments on the [preliminary recommendations](#) it developed.

Joint RySG / RrSG comment:

The Registries Stakeholder Group (RySG) and Registrar Stakeholder Group (RrSG) welcome the opportunity to comment on the Initial Report on the Protections for Certain Red Cross Names in all gTLDs and wish to make the following comments:

The RySG/RrSG are supportive of the effort to identify an agreed definitive, finite list of the full names of the Red Cross National Societies, the International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies as well as the recommendation for an exception procedure for cases where the relevant organization wishes to apply for their protected string at the second level (as described in Recommendation #2).

The RySG/RrSG are also supportive of recommendations 3-6 which provide guidance for future error corrections, additions and deletions to that list.

The RySG/RrSG are of the opinion that modifying Registry agreements for this purpose is unnecessary and has some doubts about the logistics of such an operation, especially considering the possibility of future changes to the list.

Noting the Protection of IGO and INGO Identifiers in All gTLDs Policy (<https://www.icann.org/resources/pages/igo-ingo-protection-policy-2018-01-16-en>) is similar and overlaps to some degree with the recommendations in this report. That Policy doesn't rely on modifications to the Registry agreement but rather references a resource on ICANN's web site (<https://www.icann.org/resources/pages/reserved-2013-07-08-en>) containing a link to the list of reserved labels, including Red Cross strings.

The RySG/RrSG suggest a similar approach be taken here and that updating this reserved names list is an appropriate and practical alternative to modifying all Registry Agreements.

¹ *Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.*