

Report WG on Public Comment Proceeding (DRAFT)

Version 6 – 31 August 2020

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TITLE: ccNSO PDP3 Initial Proposals for Process to Retire ccTLDs

Section I: General Overview and Next Steps

Purpose: The ccNSO Policy Development Process 3 (PDP3) working group, tasked with developing and proposing policy for the retirement of country code Top-Level Domains (ccTLDs), is seeking input and feed-back from the broader community on its proposed process to retire ccTLDs, when the country code is removed from list of country codes in the ISO 3166 standard.

Current Status: The Interim Paper is the first step in documenting the recommended policy for the retirement process of ccTLDs.

Next Steps: After closure of the Public Comment period, the working group will review the comments received and take into account in developing a final set of policy recommendations.

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Section II: Contributors

At the time this report was prepared, a total of seven (7) community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
Business Constituency	Steve del Bianco	BC
Registry Stakeholder Group	Samantha Demetriou	RySG
At-Large Advisory Committee	ALAC staff	ALAC
Russian Institute for Public Networks	Evgeny Kuskevich	RIPN
Domainregistry.de	Hans-Peter Oswald	HPO

Individuals:

Name	Affiliation (if provided)	Initials
Clement Gentry		CG
Lawrence Owala-Roberts	Microboss, Nigerian Internet Registry Authority (NIRA), Business Constituency	LOR

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Summary of Comments, References to Interim Paper, Draft WG Response

General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

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Background on the relationship between ccTLD Managers, the ccNSO and ICANN;

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Some of the comments indicated that the commenters may not be completely familiar with the relationship between ccTLD Managers, ICANN and the ccNSO. Firstly, it should be noted that only a limited group of ccTLD Managers has entered into an arrangement with ICANN (ranging from sponsorship agreements to Accountability Frameworks or an Exchange of Letters) as such arrangements are voluntary. Enforceability is limited and may only apply to Sponsorship agreements. These arrangements are mainly focused on ensuring the security and stability of the internet.

Secondly, almost all, if not all, ccTLD Managers agree that they are subject to RFC 1591, to be administered by ICANN and most of RFC 1591 is focused on the delegation and transfer of ccTLDs including transfers for issues of significant misbehaviour. Any additional policies developed by the ccNSO are limited in scope to Add, Change and Delete of ccTLD entries in the Root Zone (see Annex C of the Bylaws for details on the applicable scope for ccNSO policies). A simple example of this is that neither RFC 1591 nor ccNSO policies can affect registration policies of a ccTLD or require any type of access to ccTLD data. As such neither the ccNSO nor ICANN can require ccTLDs to undertake any specific actions with respect to their registrants.

Thirdly policies developed through the ccNSO are only applicable to ccTLD Managers which are members of the ccNSO. Although a ccTLD Manager which is not a member of the ccNSO is not subject to policies developed by the ccNSO, ICANN can still act with respect to such a ccTLD Manager: it simply means that ICANN is not constrained to apply the relevant policies in the same manner as it would to a ccNSO member.

General comments

The ALAC, RySG, and BC explicitly supported the proposed approach, definitions, and descriptions. In addition, each of these groups raised some points for consideration.

The other contributors (LOR, HPO, CG, and RIPN) focused on specific topics and did not comment on the general approach, definitions, and descriptions.

Specific comments

1. The ALAC requests that two points be considered from an end-user perspective: 1. Removal of a TLD will mean less likelihood for confusion as usually the removal of one would make room for a new one, and 2. Retirement could pose a problem for some registrants when they are used to an "old" address which will become obsolete after retirement of the ccTLD.

Reference in Interim Paper:

- o Annex A. Result of Stress Test per Identified Situations # 2 - Domain Names under management at removal date - Whether there is a significant number under management or only a limited set is not relevant. There is a need to avoid gaming the system. Rationale for Retirement process is to accommodate new ccTLDs per RFC 1591.
- o Annex A. Result of Stress Test per Identified Situations # 12 - Unforeseen technical consequences/significant consequences or other affecting other TLDs/DNS in general. Name Servers for Domain Names not under ccTLD, are still under ccTLD to be removed - Communication to customers is part of the Retirement Plan. In addition, the removal of a ccTLD is a predictable and foreseeable process. There should be no surprises. Customers should know where their essential services are hosted.

Draft WG Response: The WG thanks ALAC for the comment. The WG has discussed and considered the issues of the impact of removal of a ccTLD from the Root Zone Database File extensively as part of its stress testing of the policy and believes that the time allocated for the

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retirement of a ccTLD will significantly mitigate any issues associated with using "old" domain names.

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Does Paper need to be amended DRAFT? N

- The ALAC noted that the replacement of a non-Functional Manager should be transparent and follow due process. In addition, the IFO and the Functional Manager should work together in good faith and ensure the interests of registrants are taken into account.

Reference in Interim Paper:

- Section 3, final two sentences (page 5) - If a ccTLD is to be retired but does not have a Functional Manager the IFO cannot transfer responsibility to a new Manager according to its standard process. This set of circumstances would create a deadlock situation which would prevent the IFO from ever retiring the ccTLD. To avoid such a deadlock, and only under these specific conditions, this Policy allows the IFO to proceed with a transfer of responsibility for the ccTLD to establish a Functional Manager and insure the ccTLD can be retired. Such a transfer should follow the standard IFO Transfer process where possible.
- Annex A. Result of Stress Test per Identified Situations # 5 - Request for Transfer after the Retirement Notice is sent. – There is a gap in current policy (RFC 1591 and section 3 Fol). No specific mechanisms for expedient and "administrative" Transfer specifically targeted at orderly Retirement process.

Draft WG Response: We thank ALAC for comment and agrees with the observation as the WG noted in the above references ". Such a transfer should follow the standard IFO Transfer process where possible". As to the second point section 4.1 of the draft policy states "There is a good faith obligation for both the IFO and the Manager of the retiring ccTLD to ensure an orderly shutdown of the retiring ccTLD which takes into consideration the interests of its registrants and the stability and security of the DNS."

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- Finally, ALAC noted that the review mechanism to be used is not clear, nor is clear what exactly will be subject to a review mechanism.

Reference in Interim Paper:

- Section 5.2 (page 8) - In this Policy on Retirement decisions have been identified which shall be subject to a review mechanism.

Draft WG Response: The WG notes that the decision that could be subject of the review mechanism is explicitly listed in the policy. With respect to the second point the WG notes that the review mechanism itself is not part of the work of this WG, as noted in the Background section of the policy document, but will be dealt with in the second part of the ccNSO PDP3.

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- The RySG suggests clarifying that 1. the proposed policy is not retroactively applicable and 2. The policy does not apply to non-ccNSO members but can be used as a model.

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Reference in Interim Paper:

- o Section 3, 1st Paragraph (page 5) - This Policy applies to all entries in the Root Zone database which are identified as ccTLDs, and are subject to a Retirement Triggering Event ("Trigger").
- o Section 5.1, 1st Paragraph (page 8) - This Policy is directed at ICANN and the IFO as the entity that performs the IANA Naming Functions with respect to ccTLDs.
- o Annex A. Result of Stress Test per Identified Situations # 6 - ccTLD Manager ends membership of the ccNSO.- Policy is by definition only targeted at ICANN see Annex C of the ICANN Bylaws).It is up to ICANN to decide whether membership of the ccNSO is relevant in individual cases.
- o Annex A. Result of Stress Test per Identified Situations # 16 - Does the Retirement Policy apply to pending Retirement case? - The WG believes the applicability of the Policy to existing situations or those emerging before the proposed Policy becomes effective is out of scope of its mandate. For situations prior to this Policy coming into force, responsibility lies with the IFO to create a suitable procedure. The WG suggests that such a procedure could be based on and anticipates the proposed Policy.

Draft WG Response: The WG notes that both these topics were discussed extensively. Regarding the first point about retroactivity - Annex A. Result of Stress Test per Identified Situations # 16 states that "The WG believes the applicability of the Policy to existing situations or those emerging before the proposed Policy becomes effective is out of scope of its mandate. For situations prior to this Policy coming into force, responsibility lies with the IFO to create a suitable procedure. The WG suggests that such a procedure could be based on and anticipates the proposed Policy." As to the second point regarding applicability to non-ccNSO members the ICANN Bylaws Section 10.1 states "Policies that apply to ccNSO members by virtue of their membership are only those policies developed according to Section 10.4(i) and Section 10.4(k) – please see the Background on the ccNSO at the top of this document for a more detailed explanation."

Does Paper need to be amended DRAFT? N

5. The BC suggests two additional stress tests: 1. The confidence in the retirement process by end-users is guaranteed, and 2. Migration of critical data is properly archived and stored for historic/research purposes. With respect to the latter test, it is suggested that ICANN/ccNSO be responsible for archiving the concerned ccTLD DNS data.

Reference in Interim Paper:

- Section 6.2 (page 9) – (long please see original document).
- Annex A. Result of Stress Test per Identified Situations - (long please see original document).

Draft WG Response: Regarding the suggested additional stress test 1 the WG notes that it is unclear what the BC is seeking with this stress test. The purpose of the policy, once it is official, is the guarantee for all parties that from the date of the Notice of Retirement that the ccTLD will be retired no less than 5 years and no more than 10 years from this date. With respect to the second suggested additional stress test the WG notes there is no policy or requirement on ccTLDs relative to the archiving of any ccTLD data by or for ICANN, (see the Background on the relationship between ccTLDs, the ccNSO and ICANN at the top of this document). However ICANN could offer the retiring ccTLD the option of having its Zone File data archived for historical and research purposes.

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6. The BC suggests that IFO should include in its Notice of Removal a statement that the Registry should refrain from registering any new domain with validity beyond the proposed date of retirement.

Reference in Interim Paper:

- Section 4.2, second paragraph (page 6) - The IFO shall include with the Notice of Removal a document describing the reasonable requirements ("Reasonable Requirements Document") it expects of a Retirement Plan and note that the IFO will make itself available to the Manager to assist in the development of such a plan should the Manager request it.
- Annex A, Result of Stress Test per Identified Situations # 3 - Breach of Retirement Agreement (ccTLD Manager promotes SLD post Retirement notice, ccTLD stops all activities, ccTLD Manager does not take any action) - Process continues as if agreed. Compliance is not enforceable. However, IFO may invoke Revocation.

Draft WG Response: The WG notes that **as stated in the section Background on the relationship between ccTLD Managers, the ccNSO and ICANN - "... neither the ccNSO nor ICANN can require ccTLDs to undertake any specific actions with respect to their registrants."** **The draft retirement policy in section 4 states "If the Manager of the retiring ccTLD does not wish an extension to the Default Retirement Date stated in the Notice of Removal it is expected, but not mandatory, that the Manager produce a Retirement Plan for the ccTLD" which includes the following requirement "• the date when the ccTLD is expected to stop taking registrations, renewals and transfers that exceed the date of removal from the Root Zone. It is important to note that there is a reasonable expectation that the date provided is the earliest practical date for implementing this."** **If a manager does wish an extension to the Default Retirement Date, then the draft policy requires that the manager produce a Retirement plan to obtain the extension.**

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7. The BC also suggested that IFO should mandate a periodic review of the ISO 3166-1 MA standard to create a predictable process that triggers the Notice of Retirement.

Reference in Interim Paper:

- Section 3 (page 5). Section 4.2, first paragraph (page 6) - Once the IFO confirms that a ccTLD should be retired and has a Functional Manager, it shall promptly notify the Manager of the ccTLD that the ccTLD shall be removed from the Root Zone 5 years ("Default Retirement Date") from the date of this notice ("Notice of Removal") unless a Retirement Plan (see following sections for details) which is agreed to by the Manager and the IFO and is in accordance with this Retirement Policy stipulates otherwise.

Draft WG Response: The WG notes that this is an operational issue and should not be part of the policy. **However,** It is important to understand that the IFO is informed on a regular basis **of any changes to the standard** by the ICANN representative on the ISO3166-1 MA.

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8. The BC and LOR noted that neither the proposed policy nor the stress tests measure how registrants and key national values on the retiring ccTLD domain/servers would affect the retirement process, especially in light of multiple data privacy laws.

Relevant section in Interim Paper, if any: None

Draft WG Response: The WG notes that the issues the BC and LOR raise are outside the scope of the policy mandate of the ccNSO as defined in Annex C of the ICANN Bylaws. The ccNSO is not in a position to develop policies directed at ccTLDs with respect to their registration policies and hence registrants. See background on ccTLD Managers, the ccNSO and ICANN.

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9. The BC and LOR also raise the question whether any ICANN Bylaw changes are envisioned, or mechanisms need to be restructured to help to make this process effective.

Reference, if any, in Interim Paper: None.

Draft WG Response: The WG does not anticipate any Bylaw change nor does it anticipate major implementation issues. The proposed process takes into account and builds on the procedures used to date leading up to the removal of ccTLDs from the root zone file database.

Does Paper need to be amended DRAFT? N

10. LOR notes that as brands made massive investments in various domains, they should be provided ample notice to migrate.

Reference in Interim Paper:

- Section 4.4, 3rd Paragraph, third bullet point (page 7) - details of a Communication Plan to advise the registrants of the Retirement of the ccTLD. If the manager of the retiring ccTLD wishes to request an extension beyond the Default Retirement Date stated in the Notice of Removal it must produce a Retirement Plan which is acceptable to the IFO and is in accordance with the conditions listed below.
- Annex A, Result of Stress Test per Identified Situations # 2 - Domain Names under management at removal date - Whether there is a significant number under management or only a limited set is not relevant. There is a need to avoid gaming the system. Rationale for Retirement process is to accommodate new ccTLDs per RFC 1591.
- Annex A, Result of Stress Test per Identified Situations # 3 - Breach of Retirement Agreement (ccTLD Manager promotes SLD post Retirement notice, ccTLD stops all activities, ccTLD Manager does not take any action) - Process continues as if agreed. Compliance is not enforceable. However, IFO may invoke Revocation.

Draft WG Response: The WG has discussed the impact of removal on registered domain names. The WG believes that registrants, registrars and others will have ample time to make the necessary changes given the duration of the retirement process and the cause of the triggering event (significant change of name of the country or its dissolution).

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11. With respect to duration of the proposed process:

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- LOR notes that under some circumstances 5 years may not be long enough if, for example, 10-year registrations are allowed.
- LOR also notes that limitation of the duration makes it impossible for a registry to allow for even longer registrations and as a result that ccTLD Manager may seek redress of that situation.
- HPO considers the five (5) year period enough time. However, he suggests that if retired ccTLD is replaced by new ccTLD grandfathering rule domain names is applied, providing right of first registration to registrants under the “old” ccTLD.

Reference in Interim Paper:

- Section 4.3 (page 6) - The IFO cannot require that a retiring ccTLD be removed from the Root Zone less than 5 years from the date the IFO has sent the Notice of Removal (Subsection 4.2) to the retiring ccTLD Manager unless an alternate Retirement Date is mutually agreed to by both the ccTLD Manager and the IFO. If the Manager wishes to request an extension to the Default Retirement Date it must request this from the IFO as part of a Retirement Plan. The IFO must remove a retiring ccTLD from the Root Zone no later than 10 years after having sent a Notice of Removal to the ccTLD Manager (“Maximum Retirement Date”).
- Annex A, Result of Stress Test per Identified Situations, # 2 - Domain Names under management at removal date - Whether there is a significant number under management or only a limited set is not relevant. There is a need to avoid gaming the system. Rationale for Retirement process is to accommodate new ccTLDs per RFC 1591.
- Annex A, Result of Stress Test per Identified Situations, #12 - Unforeseen technical consequences/significant consequences or other situations affecting other TLDs/DNS in general. Name Servers for Domain Names not under ccTLD, are still under ccTLD to be removed. - Communication to customers is part of the Retirement Plan. In addition, the removal of a ccTLD is a predictable and foreseeable process. There should be no surprises. Customers should know where their essential services are hosted.

Draft WG Response: The WG has extensively discussed the duration of the retirement process considering the situations mentioned by LOR. The proposed duration was considered reasonable and balanced (it was noted that the maximum registration period for domain names in most ccTLDs is 10 years which the policy can allow for). With respect to the proposal of HPO, this is a matter of registration policy of the new ccTLD Manager of the successor/new ccTLD (see: [Background on the relationship between ccTLD managers, the ccNSO and ICANN at the top of this section for more details](#)).

Does Paper need to be amended DRAFT? N

12. LOR suggests that a retirement plan should be mandatory, even if the Functional Manager does not want an extension of the duration of the retirement process.

Reference in Interim Paper:

- Section 4.4, 2nd paragraph (page 6) - If the Manager of the retiring ccTLD does not wish an extension to the Default Retirement Date stated in the Notice of Removal it is expected, but not mandatory, that the Manager produce a Retirement Plan for the ccTLD which would typically include.....

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Draft WG Response: The WG notes that the issue LOR raises was discussed extensively by the WG and is considered outside the scope of the policy mandate of the ccNSO. [Please see Background on the relationship between ccTLD Managers, the ccNSO and ICANN at the top of this section for more information.](#)

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13. LOR suggests mandatory auditing of domain name numbers by IFO to make sure the ccTLD is truly winding down and the system is not gamed.

Reference in Interim Paper:

- Section 4.5, Final paragraph (page 8) - If the Manager becomes non-functional after a Retirement Plan is accepted, the IFO can use the same procedure outlined in the Requirements section to transfer the ccTLD to a new manager. In such cases the original timeline for retiring the ccTLD shall not change. If the Manager breaches the Retirement Plan the IFO should work with the Manager to reinstate the Retirement Plan. If this is not possible the IFO can advise the Manager that it will maintain the Default Retirement Date from the Notice of Retirement.
- Annex A, Result of Stress Test per Identified Situations # 4 - The ccTLD Manager goes bankrupt after Notification of Retirement - May become a Security and stability issue: IFO assess on case-by case basis. substantively it is responsibility of operator. Revocation may be warranted if threshold for revocation is met.

Draft WG Response: The WG notes [that this was discussed in detail but that the reality of the relationship between ccTLD Manager, the ccNSO and ICANN would not allow for this \(please see Background on the relationship between ccTLD Managers, the ccNSO and ICANN at the top of this section for more information\).](#)

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14. CG and RIPN raise concerns about the proposed irreversible impact of a trigger event leading to the removal of the ccTLD from the root zone. In view of CG and RIPN, additional conditions should be taken into account which may call for the preservation of the ccTLD, specifically: The ccTLD can still be of commercial, cultural, historical or other relevant use for a broad community and /or if there is a clear successor state, as recognized by United Nations, than the government of this state may show willingness and interest to go on with supporting the ccTLD, which otherwise could be retired

Reference in Interim Paper:

- Section 3, 2nd Paragraph (page 5) - The ISO 3166-1 list is dynamic and country codes are added and removed on a regular basis. When a new ISO 3166-1 Alpha-2 code element ("Alpha-2 code") is added, a ccTLD corresponding to that Alpha-2 code can be added to the Root by the IANA Naming Functions Operator ("IFO"). However, as was identified by the ccNSO Delegation and Redefinition Working Group in 2011, there is no formal Policy available for the removal of a ccTLD from the Root Zone when a country code is removed from the ISO 3166-1 list of country names.
- Annex A. Result of Stress Test per Identified Situations, #11 - Island state disappears, but interests (was commercial interests)" intend to keep ccTLD "alive" - If the Code Element is removed, the ccTLD is eligible for Retirement. Reason for removal is not of relevance.

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- Annex A. Result of Stress Test per Identified Situations #13 - Country disappears/ however there is a clear successor state - Countries do not disappear overnight. Takes some time before ISO-code is removed. In addition the decision to remove country code is not part of the Policy.

Draft WG Response: The WG appreciates the concerns raised **however these are out of scope for the ccNSO, ccTLDs are a very special class of TLDs and their very existence is predicated on there being an corresponding entry in the ISO-3166-1 standard.** As stated in **section 1.2 of the draft policy "RFC 1591 - JANA is not in the business to determine what is and what is not a country" and the WG believes this** should be **strictly** adhered to.

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