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# CENTR Member Input to
# CWG on Use of Country and Territory Names and Codes as TLDs

**Survey Initiated by:** CENTR

**Survey timing:** 14 Oct – 7 Nov 2015
**Respondents** (22 ccTLD organisations): .al, .be, .ch, .de, .dk, .ee, .es, .hr, .is, .jp, .lu, .lv, .me, .mt, .nl, .no, .pl, .pt, .rs, .ru, .se, .tr

The above survey respondents have access to individual responses (csv) from this survey at:
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**Background**: Background: The ccNSO and GNSO Councils have chartered a Cross Community Working Group on the Use of Country and Territory Names as top-level domains (CWG-UCTN). The objective of the CWG-UCTN is to review the current status of representations of country and territory names, as they exist under current ICANN policies, guidelines and procedures. In addition, the Group has been asked to provide advice regarding the feasibility of developing a consistent and uniform set of definitions that could be applicable across the respective SO's and AC's for country and territory names as top-level domains. The WG is strictly limited to:

Representations of names of Countries, Territories and their subdivisions listed on or eligible to be listed on the Alpha-2 code International Standard for country codes and codes for their subdivisions (ISO 3166-1), (Names of Country and Territory). Other geographical indicators, such as regions, are excluded;

The use of Country and Territory names as Top Level Domains. The use of Country and Territory names as second or other level is excluded.

The CWG-UTCN has divided its work into three work stream: 2-letter codes, 3-letter codes, and full names of countries and territories; currently the Group is starting its discussion on 3-letter codes and it is on this issue specifically that your feedback is being sought at this time. Please note that the community will be given ample opportunity to comment and provide feedback on all other issues in due course.

REFERENCE:
ISO 3166-1 list (Wikipedia)

## Overview of Responses


| | | |
|---|---|---|
| **1** | Should 3-character Ascii strings be eligible for use as gTLDs as long as they are not in conflict with existing alpha-3 codes from ISO 3166-list? | 73% / 27% |
| **2** | Should 3-character Ascii strings be eligible for use as gTLDs as long as they receive documentation of support or non-objection from relevant government or public authority? | 59% / 14% / 27% |
| **3** | Should 3-character Ascii strings be eligible for use as gTLDs as long as they receive documentation of support or non-objection from relevant government or public authority if they are in conflict with existing alpha-3 codes from ISO 3166-list? | 32% / 50% / 18% |
| **4** | Should 3-character Ascii strings be eligible for use as gTLDs as long as they are not conflicting with any applicable string similarity rules? | 64% / 23% / 14% |
| **5** | Should all IDN 3-character strings be reserved exclusively as ccTLDs and be ineligible as IDN gTLDs? | 23% / 55% / 23% |
| **6** | Should there be unrestricted use of IDN 3-character strings as gTLDs if they are not in conflict with existing TLDs or any applicable string similarity rules? | 59% / 18% / 23% |
| **7** | Should 3-character strings in the ISO 3166 list be reserved all together (to avoid user confusion)? | 45% / 27% / 27% |

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**7** - Should 3-character strings in the ISO 3166 list be reserved all together (to avoid user confusion)?

## Individual Responses

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | Advantages or disadvantages |
|---|---|---|---|---|---|---|---|---|
| .es | Yes | Yes | Yes | Not sure | Not sure | No | Not sure | |
| .nl | No | Yes | No | Yes | No | Yes | Not sure | The interest that in our opinion should be protected is the interest of the local internet community (including the local government) of the use of any domain of which the name has a connotation with a certain country as a 'national' domain. We for example do not oppose the use of .ned as a brand domain for the NED company, that probably exists somewhere, as long as NED does not starts selling .ned domains to be used to claim a connection with the Netherlands. All domains that aim to do the latter (acting as if they are a ccTLD) should only be eligible with the support of the local internet community. So it can be a gTLD (for brands or whatever) or a ccTLD (if (implicitly or partly) available to be used in a similar fashion as a ccTLD. This leaves two options with regard to the possible release of such TLD as gTLD<br>1. Consent of the local internet community (that sets certain limitations for use) and the ability to withdraw such consent if the limitations are violated<br>2. General ICANN rules that adequately set certain limitations for use (contractual) and will be upheld by ICANN compliance. |
| .se | Yes | Not sure | No | Yes | Not sure | Not sure | Yes | |
| .is | Yes | Yes | No | No | No | Yes | Yes | |
| .de | Yes | Yes | Yes | Yes | No | Yes | Not sure | |
| .me | Yes | Yes | No | Yes | No | Yes | Not sure | |
| .rs | Yes | Not sure | No | Yes | Yes | Not sure | Yes | |
| .ru | Yes | Yes | Yes | Yes | No | Yes | No | |
| .ch | No | Yes | Not sure | No | No | Yes | Yes | |
| .dk | No | Yes | No | No | Yes | No | Yes | |
| .tr | No | No | No | Yes | Yes | No | Yes | |
| .no | Yes | Yes | Yes | No | No | Yes | Yes | Our main view is that the rules in the AGB existing for the first round of new gTLDs as regards use of country & territory names should be continued - that is: All 3-character strings on the ISO 3166-1 list |

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| | | | | | | | | should not be allowed as TLDs. This is first and foremost relevant for ASCII characters. IDNs raises different questions. If 3-charcter ASCII on the ISO 3166-1 list should be allowed, this must be in cooperation with the relevant government - the same rules as for capitols and some cities today. It will then be a gTLD, following the same policy as other gTLDs, not a ccTLD, following local policy. However, the government would then be able to set some critera for giving their support. |
| .pt | Yes | No | No | Not sure | Not sure | Not sure | Yes | In terms of disadvantages this option, being conservative, can create some limits in terms of competition and market opening. On the other hand, and considering the advantages, this could be a way to protect our ccTLD and avoid confusion among the consumers. |
| .mt | No | Not sure | No | Not sure | Yes | No | Yes | I believe that the domain codes identifying countries as specified in alpha-3 codes should be unambiguously distinguished from gTLDs domain codes. This is my personal opinion. My colleagues from .MT might have different opinion. Victor Nezval (.MT) |
| .jp | No | No | No | Yes | No | Yes | No | As to ASCII, ccTLDs had better be perceived as 2-letter strings. Otherwise they will be a dilution regarding ccTLD uniqueness. The response above is a personal position, not a JP ccTLD registry's. |
| .pl | Yes | Not sure | Yes | Yes | Not sure | Not sure | No | Blocking of the whole table makes no sense. Only names assigned to countries and territories should be reserved; similiarity should be excluded, there are other rules, as far as I know, to sort out potential claims. |
| .lv | Yes | Yes | Yes | Yes | No | Yes | No | |
| .hr | Yes | Yes | Not sure | Yes | Not sure | Yes | Not sure | Possible users' confusion<br>As a consequence of the previous, potential misuse |
| .lu | Yes | Not sure | Not sure | Yes | No | Yes | No | |
| .al | Yes | Yes | Not sure | Yes | Yes | Not sure | Not sure | |
| .ee | Yes | Yes | No | No | No | Yes | Yes | |
| .be | Yes | Not sure | Yes | Yes | No | Yes | No | It would be very strange to block future 3-character TLD's from entry in the root given that 3-character TLD's were allowed during all previous gTLD rounds and for the legacy TLD's such as .com. There should be guarantees to avoid string confusion and a right for governments to object against the delegation of a 3-character TLD that matches their alpha3-code but nothing beyond that. |

## Additional Comments

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| .be | The WG should consider a fair and simple procedure for governments to raise their objections. I refer to the actual discussions and debate between GAC, ICANN Board & community with regard to the 2-letter domain names release under the new gTLD's. If you want to persuade the governments, there will have to be clearer procedures than the current ones. |
| .no | It is important to remember that even if no country has a legal right to the 3-letter code representing the country, what the CWG-UCTN is trying to find is a framework, a policy. ICANN is free to form the contract with the applicants the way that the community decides. This is a private contract between 2 parties. If ICANN decides to reserve the 3-letter codes on the ISO list, they are free to do it. If they want to open it for gTLDs, they are legally free to do that too. Whether it is politically wise, is another question. In our opinion, it is not. |
| .pl | IDN 3 character strings should be implemented in line with rules we already have got in ISO tables maintenance rules; it would allow us avoiding potential future confusions whem managing too many different rules. |
| .tr | We think that any scenarios that may create conflict should not be allowed. |