

Overview for Potential Options: 2-letter codes (1.1.4 Potential Options in draft document)

Version 12 June 2015

<p>1.1.4 POTENTIAL OPTIONS</p>	<p>OPTION 1: <i>All two-character strings reserved for use as ccTLD only, ineligible for use as gTLD (ASCII)</i></p>	<p>OPTION 2: <i>(Version 2a: Two-character strings eligible for use as gTLD if not in conflict with ISO 3166-1.)</i> <i>(Version 2b: Two-character strings eligible for use as gTLD if not in conflict with [ISO 3166-1 and/or other standard/list].)</i> <i>(ASCII)</i></p>	<p>OPTION 3: <i>Unrestricted use of two-character strings if not in conflict with an existing ccTLD or any applicable string similarity rules.</i> <i>(ASCII)</i></p>	<p>OPTION 4: <i>Future two-character strings reserved for use as IDN ccTLD only, ineligible for use as gTLD (IDN)</i></p>	<p>OPTION 5: <i>Unrestricted use of two-character strings if not in conflict with an existing TLD or any applicable string similarity rules or [other conflict conditions to be discussed, for example, visually similar to any one-character label (in any script) or visually similar to any possible two-character ASCII combination]</i> <i>(IDN)</i></p>
<p>Gregori Saghyan, .am/ccNSO</p>	<p>Benefit: It allows users to avoid confusion with ccTLD strings Risk: In general this measure is not enough, lot of users do not have even minimal information about quantity of</p>	<p>Benefit: 2a, 2b: possibility to sell more new gTLD strings. Risk: 2a, 2b. User confusion could be more cases, than in point 1. Possible to minimize such risks if there will be difference in representation of ccTLD strings in the browser (example – different colors for ccTLD and gTLD strings)</p>	<p>Benefit: possibility to sell more new gTLD strings. Risk: User confusion could be more cases, than in point 1, 2a,2b.</p>	<p>Benefit: Multilingual presence Risk: Small risk of confusion, but it exists. IDN for ccTLD is not limited by 2 characters, possible to use more than 2 letters in ccTLD</p>	<p>Benefit: Multilingual presence Risk: Small risk of confusion, similar with point 4. High risk for confusion for visibly similar string with other scripts. Better to provide different representation for ccTLD and gTLD strings in browsers.</p>

	letters in domain names. In this situation this part of users could be confused.				
Annebeth Lange, .no/ccNSO	<p>Benefits: Maintain the differentiation between ccTLDs and gTLDs. Avoid user confusion. Maintain the possibility for new countries established in the future having their ccTLD as well as existing countries.</p> <p>Risks: A few brands will suffer if they should want their own gTLD.</p>	<p>Benefits: A few companies will then be able to have their brand as gTLD, if the 2-letter combination is not on the list/lists.</p> <p>Risks: Will blur the distinction of today between ccTLDs and gTLDs. Creating user confusion between what is ccTLDs under local laws and gTLDs under global laws. Taking away the possibility for future established countries getting their ccTLD.</p>	<p>Benefits: A few companies will be able to have their brand as gTLD, if the 2-letter combination is not in use already</p> <p>Risks: Will blur the distinction of today between ccTLDs and gTLDs. Creating user confusion between what is ccTLDs under local laws and gTLDs under global laws. Taking away the possibility for future established countries getting their ccTLD. Will remove the historic signification of the ISO list and be in contradiction with RFC 1591.</p> <p>We never know if there will be new countries in the future that will need 2-letter codes given to brands. Even if the combination is not on the ISO-list today, they might be in the future. And then the confusion will arise again.</p>	<p>Benefits: Maintain the differentiation between ccTLDs and gTLDs . Avoid user confusion.</p> <p>Risks: If a brand name in non-ASCII has 2 letters/signs, some brands might suffer.</p>	<p>Benefits: A few companies will be able to have their brand as gTLD, if the brand name in script consists of a 2-letter combination. Other words than brands that are wanted as a gTLD (real generic), would then be possible.</p> <p>Risks: Will blur the distinction of today between ccTLDs and gTLDs. Creating user confusion between what is ccTLDs under local laws and gTLDs under global laws. Even if there is established a solution for conflict conditions such as a 2-letter IDN visually similar to other combinations, the blur between ccTLDs and gTLDs will occur.</p>
Joke Braeken, .eu/ccNSO	<p>Benefits: Clear distinction</p>	<p>Benefits: Two-character strings are potentially commercially attractive, and some gTLD</p>	<p>Benefits: Two-character strings are potentially commercially attractive, and some gTLD</p>	<p>Benefit: Clear distinction between ccTLDs</p>	<p>Benefits: Two-character strings are potentially commercially attractive, and some gTLD</p>

	<p>between ccTLDs and gTLDs, merely based on the length of the TLD, thus avoiding user-confusion. One avoids the issue of having a 2-character gTLD assigned, which might correspond to the 2-letter code of a potential future country.</p> <p>Risks: Two-character strings are potentially commercially attractive, and some gTLD applicants might regret missing out on the opportunity.</p>	<p>applicants might benefit from this opportunity.</p> <p>Risks: The clear distinction between ccTLDs and gTLDs, based on TLD length, is lost. This will increase the end-user confusion. After all, the legal frameworks governing ccTLDs and gTLDs are different. Having a 2-character gTLD assigned, which might correspond to the 2-letter code of a potential future country, will disadvantage said country. ISO 3166 country codes are used for a broad range of applications, for example but not limited to, marking of freight containers, postal use and as a basis for standard currency codes. The risk of string confusion is not a technical DNS issue, but can have an adverse impact on the security and stability of the domain name system, and as such should be minimized and mitigated.</p> <p>[source: http://ccnso.icann.org/workinggroups/ids/idn-ccpdp-final-29mar13-en.pdf - page 12]</p>	<p>applicants might benefit from this opportunity.</p> <p>Risks: The clear distinction between ccTLDs and gTLDs, based on TLD length, is lost. This will increase the end-user confusion. After all, the legal frameworks governing ccTLDs and gTLDs are different. Having a 2-character gTLD assigned, which might correspond to the 2-letter code of a potential future country, will disadvantage said country. In conflict with RFC1591, which identifies and preserves the link between ccTLDs and the ISO 3166-1 list, ISO 3166 country codes are used for a broad range of applications, for example but not limited to, marking of freight containers, postal use and as a basis for standard currency codes. The risk of string confusion is not a technical DNS issue, but can have an adverse impact on the security and stability of the domain name system, and as such should be minimized and mitigated.</p> <p>[source: http://ccnso.icann.org/workinggroups/ids/idn-ccpdp-final-29mar13-en.pdf - page 12]</p> <p>The clear distinction between</p>	<p>and gTLDs, merely based on the length of the TLD, thus avoiding user-confusion.</p> <p>Risks: Two-character IDN strings are potentially commercially attractive, and some gTLD applicants might regret missing out on the opportunity.</p>	<p>applicants might benefit from this opportunity.</p> <p>Risks: The clear distinction between ccTLDs and gTLDs, based on TLD length, is lost. This will increase the end-user confusion. After all, the legal frameworks governing ccTLDs and gTLDs are different. ISO 3166 country codes are used for a broad range of applications, for example but not limited to, marking of freight containers, postal use and as a basis for standard currency codes. The risk of string confusion is not a technical DNS issue, but can have an adverse impact on the security and stability of the domain name system, and as such should be minimized and mitigated.</p> <p>[source: http://ccnso.icann.org/workinggroups/ids/idn-ccpdp-final-29mar13-en.pdf - page 12]</p>
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			ccTLDs and gTLDs, based on TLD length, is lost, once opening up 2-letters as gTLDs. This will increase the end-user confusion. After all, the legal frameworks governing ccTLDs and gTLDs are different. Having a 2-character gTLD assigned, which might correspond to the 2-letter code of a potential future country, will disadvantage said country.		
Laura Hutchison, .uk/ccNSO	<p>Benefits: Maintains status quo and continues the precedent of a level of protection for ccTLDs. Provides a space for national identity on the internet. New countries would have a ccTLD available to them.</p> <p>Risks: Restricts</p>	<p>Benefits: More flexibility in the system while also allowing a level of protection for existing countries.</p> <p>Risks: Risk of consumer confusion as some 2-letter TLDs will relate to gTLDs and some to ccTLDs. Possible conflict for new countries if the countrycode they are assigned has already been registered as a gTLD – does this have legal implications for ICANN?</p>	<p>Benefits: More flexibility in the system while also allowing a level of protection for existing ccTLDs.</p> <p>Risks: As above - Possible conflict for new countries if the countrycode they are assigned has already been registered as a gTLD.</p> <p>Risks: The clear distinction between ccTLDs and gTLDs, based on TLD length, is lost, once opening up 2-letters as gTLDs. This will increase the end-user confusion. After all, the legal frameworks governing ccTLDs and gTLDs are different. Having a 2-character gTLD assigned, which might correspond to the 2-letter code of a potential future country, will disadvantage said country. The current protection of two</p>	<p>Benefits: Allows some flexibility in the system while also allowing a level of protection for existing ccTLDs. Promotion of IDN's and multi-lingual internet usage.</p> <p>Risks: Issues around IDNs being visually similar to existing ccTLDs. What provisions would there be for new non-IDN ccTLD registrations? What list</p>	<p>Benefits: More flexibility in the system while also allowing a level of protection for existing TLDs.</p> <p>Risks: As above - Possible conflict for new countries if the countrycode they are assigned has already been registered as a gTLD.</p>

	potential for new gTLD registrations for what could be seen as short "premium" TLDs		letter codes has set a precedent, is understood by internet users and provides a dedicated space for national identities. Changing this, changes the fundamental structure that end users are used to and will create confusion. There is also the risk of new country codes clashing with two letter stings that have been allocated as gTLDs which would have serious consequences.	provides a definitive list of acceptable IDN characters and their correlation to country codes?	
Colin O'Brien, IPC, GSNO			<p>Benefits: Allows brand owners the opportunity to obtain gTLD strings which reflect their trademarks. There would not be any initial confusion on the part of the user as they would know immediately that they are on an branded website. Allows ICANN to acknowledge that there are 2 character terms which have been deemed entitled to trademark protection by governments throughout the world.¹</p> <p>Risks: The clear distinction between ccTLDs and gTLDs,</p>		

¹ Representative companies/brands

GE (General Electric), LG (LG), BP (British Petroleum), PG (Procter & Gamble), Q8 ([Kuwait Petroleum International Limited](#)), 3M (3M), AA (American Airlines), BA (British Airlines), CK (Calvin Klein), HP (Hewlett-Packard), DB (Deutsche Bank), EA (Electronic Arts), FT (The Financial Times Ltd.), GM (General Motors), IG (IG Group, Plc), JJ (Johnson & Johnson), VW (Volkswagen Corporation)

			<p>based on TLD length, is lost.</p> <p>Note: Having multiple applications for the same string (for instance AA = Aerolíneas Argentinas & American Airlines) should not be classified as a risk. There is already a procedure in place when two entities with equal rights want a TLD string. Specifically the auction procedures as established by section 4.3 of the applicant guidebook.</p> <p>The comment regarding a risk of consumer confusion if a 2-char TLD is used by a multinational brand but it is also an acronym/brand of a local one. (ex. BA = British Airlines but also Banco Atlántico) seems tenuous. If a user is looking for Banco Atlantico and enters home.ba and is taken to a homepage for British Airways they are not confused.</p> <p>Right now there are over 300 Two letter combinations which have not been assigned by ISO-3166-1. See, http://en.wikipedia.org/wiki/ISO_3166-1_alpha-2. I really can't foresee more than 300 new countries being created in the future. Further the number of closed brand TLDs would likely be limited. Looking at the</p>		
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			availability on ISO-3166-1 the only company names that I see are HP, LG and VW.		
Jordi Iparraguirre, .cat/ccNSO			Risks: Risk of having multiple applications for the same string (for instance AA = Aerolíneas Argentinas & American Airlines). Risk of consumer confusion if a 2-char TLD is used by a multinational brand but it is also an acronym/brand of a local one. (ex. BA = British Airlines but also Banco Atlántico)		
Daniel Kalchev, .bg/ccNSO			Risk: I would too like to highlight this issue. Specifically, RFC1591 says "IANA is not in the business to determine what is and what is not a country". Assigning a two letter code to a gTLD will essentially make the ISO list obsolete/ignored. This might have many other implications.		
Jaap Akkerhuis, Expert, ccNSO			Risk: There is a chance that the code for a new country will collide with the code string for a TLD. The probability might be low but the this will cause severe problems when it happens.		
Susan Payne, RySG			From Conference Call (8 June 2015): Comments that have been submitted so far talk about the benefit of maintaining the differentiation between ccTLDs		

			<p>and gTLDs by maintaining the distinction between two letters being CCs and not being released to gTLDs.</p> <p>This isn't necessarily a disagreement with that, but I think that ignores the reality of the fact, which is that some ccTLDs have effectively sold their domain to private usage so that for example, Dot TV or Dot PW, I mean, they are ccTLDs. But there is no way that they are being operated as such.</p> <p>There already is no distinction for some ccTLDs between the ccTLD and the gTLD in practice. And I think we have a number of comments which are talking about a distinction which is already being increasingly blurred. And I think we have to acknowledge that.</p> <p>I understand that it's the local community that's decided how to use [their ccTLD]. But [ccTLDs sell their domain to private usage so that for example, Dot TV or Dot PW], that is not maintaining the differentiation between gTLDs and ccTLDs, and it is not avoiding user confusion. That is a different justification benefit to the local community if you like which is a financial and commercial one, but it's not</p>		
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			about user confusion and maintaining differentiation.		
Mirjana Tasic, .rs			Risk: I also agree with all concerns regarding two letter gTLD registrations. CCNSO community put a lot of effort in last 30 years, to establish ccTLD "brand". All this efforts will be depreciated if two letter code TLDs would be sold as GTLDs		
Young-eum Lee, ccNSO Council			Risk: Opening up two letter codes to allow for the creation of gTLDs, even if they were operated as a closed network, will change the structure of the system completely. Whether the unassigned two letter codes have the possibility of being assigned or not is a secondary matter. There is a fundamental difference between the gTLD and the ccTLD system. The protection of the two letter codes have historically represented the recognition of the importance of the sovereignty of the respective nations in cyberspace. Of course some of the ccTLDs are operated more openly than others but the privilege to make such decisions lie with the		

			<p>respective country. The gTLD space is an important space and we should do as much as possible to encourage and support its development. However, respect for the sovereignty of each country within cyberspace is something that cannot be compromised. After all, the gTLD space occupies ALL TLD domain space over 3 characters which is exponentially larger than the two letter space.</p>		
Elise Knutssøn Lindeberg, GAC (Norway)			<p>Risk: This could cause confusion and possibly future problems when it comes to delegations of new ccTLDs.</p>		
Volker Greimann, Registrar Stakeholder Group GNSO	<p>Benefits: - Maintaining a clear differentiation between gTLDs and ccTLDs Reservation for potential future ccTLDs Risks: Disenfranchisement of two-letter brands such as VW,</p>	<p>Benefits: - Risks: - new countries may find themselves with no appropriate free two-letter strings for their ccTLD</p>	<p>Benefits: -Available of these strings to applicants with appropriate rights in such strings Equal treatment with IDN two character strings Risks: new countries may find themselves with no appropriate free two-letter strings for their ccTLD</p>	<p>Benefits: Maintaining a clear differentiation between gTLDs and ccTLDs Reservation for potential future ccTLDs Risks: Disenfranchisement of two-letter brands such as VW, generic two-letter strings. - IDN two</p>	<p>Benefits: Available of these strings to applicants with appropriate rights in such strings Equal treatment with IDN two character strings Risks: new countries may find themselves with no appropriate free two-letter strings</p>

	generic two-letter strings. - IDN two character strings are already possible as gTLDs			character strings are already possible as gTLDs	
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