

# At-Large Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes Workspace

Comment Close Date	Statement Name	Status	Assignee (s)	Call for Comments Open	Call for Comments Close	Vote Open	Vote Close	Date of Submission	Staff Contact and Email	Statement Number
17 Aug 2016	<a href="#">Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes</a>	No Statement	n/a	n/a	n/a	n/a	n/a	n/a	Krista Papac krista.papac@icann.org	n/a

For information about this Public Comment, please click [here](#) >>

- [Comments Forum](#)

## Brief Overview

**Purpose:** As per Section 2 of Specification 5 of the New gTLD Registry Agreement, "All two-character ASCII labels shall be withheld from registration or allocated to Registry Operator at the second level within the TLD. Such labels may not be activated in the DNS, and may not be released for registration to any person or entity other than Registry Operator, provided that such two-character label strings may be released to the extent that Registry Operator reaches agreement with the related government and country-code manager of the string as specified in the ISO 3166-1 alpha-2 standard. The Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN."

This public comment is to gather community feedback in order to establish the list of measures a registry must implement in order to release from reservation at the second-level of the domain name system letter/letter two-character ASCII labels not otherwise reserved pursuant to Specification 5 Section 6 of the Registry Agreement. If adopted, all currently reserved two-letter second-level domains would be released for all gTLD registries who implement the measures.

**Current Status:** With input from governments and registry operators, ICANN has developed the document [Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes](#) [PDF, 267 KB], currently open for public comment.

**Next Steps:** Taking into consideration the feedback provided by the community during the public comment period, ICANN will establish a list of measures registries must implement in order to release from reservation letter/letter two-character ASCII labels not otherwise reserved pursuant to Specification 5 Section 6 of the Registry Agreement. If adopted, all currently reserved two-letter second-level domains would be released for all gTLD registries who implement the measures.

## Section I: Description, Explanation, and Purpose

The Proposed Measures for Letter/Letter Two-Character ASCII Labels are intended to address confusion concerns submitted by governments regarding two-letter domain names and corresponding country codes. Registry operators were asked to submit measures to avoid those government concerns, and from the various measures registry operators submitted, ICANN produced the Proposed Measures.

The list of Proposed Measures consists of three measures: exclusive availability pre-registration period, registration policy and post-registration complaint investigation. Two measures apply to all gTLD registry operators, and one measure applies only to gTLD registry operators without an executed Specification 13 or an exemption from Specification 9 - Code of Conduct. If the Proposed Measures are adopted, all currently reserved two-letter second-level domains would be released for all gTLD registries who implement the measures.

For information about the comments governments submitted or the measures submitted by registries, please see links to those summaries in Additional Resources.

## Section II: Background

Under Specification 5 of the base new gTLD Registry Agreement, registry operators are required to reserve all two-character ASCII labels at the second-level. Concurrently, the Registry Agreement states that the registry operator can request approval from ICANN to release these labels subject to implementation of measures to avoid confusion with the corresponding country codes. Specification 5 Section 2 of the new gTLD Registry Agreement states the following:

All two-character ASCII labels shall be withheld from registration or allocated to Registry Operator at the second level within the TLD. Such labels may not be activated in the DNS, and may not be released for registration to any person or entity other than Registry Operator, provided that such two-character label strings may be released to the extent that Registry Operator reaches agreement with the related government and country-code manager of the string as specified in the ISO 3166-1 alpha-2 standard. The Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN.

Per Board Resolution 2014.10.16.14, ICANN staff developed and launched on 1 December 2014 the [Authorization Process for Release of Two-Character ASCII Labels](#) for registries to request the release of two-character ASCII labels at the second-level for registration and activation in the domain name system (DNS) pursuant to Section 2 of Specification 5. Background information regarding the Authorization Process can be found [here](#). Under this process, two-character non-letter/letter ASCII labels were released across all new gTLDs. For letter/letter two-character ASCII labels, registries could submit requests for authorization to release such labels, and relevant governments could submit comments regarding the requests. Non-objected letter/letter labels were withheld from authorization as ICANN continued to consider comments submitted.

On 6 October 2015, ICANN launched the [Two-Character Letter/Letter Comments Consideration Process](#) to fully consider comments received and evaluate the labels that have been withheld thus far due to comments received under the [Authorization Process for Release of Two-Character ASCII Labels](#). Under the Comments Consideration Process, ICANN reached out to governments who previously submitted comments to provide clarification of their concerns, including why a relevant government may believe a specific *label.TLD* combination causes confusion with the corresponding country code. Governments could continue to submit new comments for new requests.

As part of its consideration of submitted comments, ICANN evaluated comments in light of the standard in the Registry Agreement, which states, "The Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN." Labels with comments not pertaining to confusion with the corresponding country code were released for authorization, and those commenters were directed to other recourse mechanisms, such as the Abuse Contact if abuse was suspected.

Labels with comments pertaining to confusion continue to be withheld from authorization per the Comments Consideration Process until a standardized set of measures to avoid confusion is developed. Registry operators were asked to submit proposed measures to avoid confusion with the corresponding country code.

Additionally, on 30 June 2016, the Governmental Advisory Committee (GAC) issued advice in its [GAC Helsinki Communiqué](#) [PDF, 328 KB] regarding two-letter country/territory codes at the second level, which is subject to further discussions between the ICANN Board and the GAC.

From the individual governments' and registry operators' inputs, and taking into consideration the GAC's advice, ICANN created a list of measures a registry needs to implement in order to release letter/letter two-character ASCII labels at the second-level. This list, the [Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes](#) [PDF, 267 KB], is currently posted for public comment.

### Section III: Relevant Resources

- Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes (<https://www.icann.org/en/system/files/files/proposed-measures-two-char-08jul16-en.pdf>) [PDF, 267 KB]
- Summary of Comments Submitted by Governments Regarding Requests for Release of Letter/Letter Two-Character ASCII Labels at the Second Level (<https://www.icann.org/en/system/files/files/summary-comments-government-two-char-08jul16-en.pdf>) [PDF, 297 KB]
- Summary of Registry Operators' Proposals of Measures to Avoid Confusion with the Corresponding Country Code (<https://www.icann.org/en/system/files/files/summary-registry-operators-proposal-country-code-08jul16-en.pdf>) [PDF, 411 KB]
- GAC Helsinki Communiqué ([https://gacweb.icann.org/display/gacweb/Governmental+Advisory+Committee?preview=/27132037/43712639/20160630\\_GAC%20ICANN%2056%20Communique\\_FINAL%20.pdf](https://gacweb.icann.org/display/gacweb/Governmental+Advisory+Committee?preview=/27132037/43712639/20160630_GAC%20ICANN%2056%20Communique_FINAL%20.pdf)) [PDF, 328 KB]
- All comments submitted by the governments before 6 October 2015 ([http://mm.icann.org/pipermail/twochar\\_comments/](http://mm.icann.org/pipermail/twochar_comments/))
- All comments submitted by the governments on or after 6 October 2015 (<https://www.icann.org/resources/two-character-comments>)
- Proposed measures to avoid confusion submitted by Registry Operators (<https://www.icann.org/resources/two-character-comments>)
- Authorization Process for Release of Two-Character Labels (<https://www.icann.org/resources/two-character-labels>)
- Two-Character Letter/Letter Comments Consideration Process (<https://www.icann.org/resources/pages/two-character-comments-consideration-2015-10-06-en>)

### Section IV: Additional Information

### Section V: Reports

#### Staff Contact

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## FINAL VERSION TO BE SUBMITTED IF RATIFIED

*The final version to be submitted, if the draft is ratified, will be placed here by upon completion of the vote.*

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**FINAL DRAFT VERSION TO BE VOTED UPON BY THE ALAC**

*The final draft version to be voted upon by the ALAC will be placed here before the vote is to begin.*

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**FIRST DRAFT SUBMITTED**

*The first draft submitted will be placed here before the call for comments begins.*