

# At-Large Introduction of Two-Character Domain Names in the New gTLD Namespace Workspace

Comment Close Date	Statement Name	Status	Assignee (s)	Call for Comments Open	Call for Comments Close	Vote Announcement	Vote Open	Vote Reminder	Vote Close	Date of Submission	Staff Contact and Email
10.07.2014	<a href="#">Introduction of Two-Character Domain Names in the New gTLD Namespace</a>	ADOPTED 13Y, 0N, 2A	<a href="#">Dev Anand Teelucksingh</a>	08.08.2014	11.08.2014 20:00 UTC	11.08.2014 23:00 UTC	11.08.2014 23:00 UTC	15.08.2014	16.08.2014 23:00 UTC	16.08.2014	<a href="#">Krista Papac</a> <a href="mailto:krista.papac@icann.org">krista.papac@icann.org</a>

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

- [Comments Forum](#)

## Brief Overview

To obtain community input on the proposed amendments to the Registry Agreements of several registry operators to implement a new registry service which would permit the introduction of two-character domain names for registration in the new gTLD namespace resulting from the recently processed Registry Services Evaluation Process (RSEP) requests submitted by several registries.

Comment Period: 12 Jun 2014 - 10 Jul 2014 23:59 UTC

Reply Period: 11 Jul 2014 - 1 Aug 2014 23:59 UTC

## Section I: Description, Explanation, and Purpose

Specification 5 (Schedule of Reserved Names), Section 2 of the New gTLD Registry Agreement addresses reservations of two-character labels. As provided in Specification 5:

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.

The New gTLD registry operators noted below submitted requests to ICANN through the Registry Services Evaluation Process (RSEP) to release certain two-character strings. In total, the requests concern 148 New gTLDs. Implementation of the proposal would require an amendment to the Exhibit A of the respective Registry Agreements, which is being posted for public comment.

Proposal	TLD	Registry Name	Documents
2014011	Multiple TLDs	Donuts, Inc.; submitted by Binky Lake, LLC*	<a href="#">Binky Lake, LLC Request 09 May 2014</a> [PDF, 19 KB]
2014010	kred	KredTLD Pty Ltd	<a href="#">KredTLD Pty Ltd Request 11 March 2014</a> [PDF, 18 KB]
2014009	best	BestTLD Pty Ltd	<a href="#">BestTLD Pty Ltd Request 11 March 2014</a> [PDF, 18 KB]
2014008	ceo	CEOTLD Pty Ltd	<a href="#">CeoTLD Pty Ltd Request 11 March 2014</a> [PDF, 18 KB]
2014007	wiki	Top Level Design, LLC	<a href="#">Top Level Design LLC Request 11 March 2014</a> [PDF, 196 KB]
2014006	globo	Globo Comunicação e Participações S.A	<a href="#">Globo Comunicação e Participações SA Request 05 February 2014</a> [PDF, 18 KB]

\*Note: Binky Lake, LLC has submitted a RSEP request on behalf of Donuts, Inc. for 143gTLDs.

As part of these requests, each registry operator described which two-character domain names in which it would offer these registrations. These RSEP requests were posted for public information on the Registry Service Evaluation Process webpage, available at <https://www.icann.org/resources/pages/rsep-2014-02-19-en>.

See below for a summary of each RSEP request:

- **.ventures** - request made *9 May 2014* by Binky Lake, LLC (on behalf of 143 Donuts, Inc. operated TLDs). The proposal requests the release of all two-character ASCII labels that do not appear on the ISO 3166-1 alpha-2 list and for which there is no corresponding government or country-code operator. To avoid user confusion with the two-character country codes, the registry operator noted in its RSEP that "the release of these two-character ASCII labels poses no risk of confusion with any country-code, as this initial request relates only to two character labels where there is no corresponding country code and no relevant government or corresponding country-code operator. Therefore, the restrictions placed on this set of two-character ASCII labels are unwarranted and should be lifted forthwith."
- **.kred** - request made *11 March 2014* by PeopleBrowser, which proposes to amend contractual language and implement an equitable phased allocation program that will permit the introduction of two-character domains, while still reserving two-letter domains that correspond to the two-letter country code names found on the ISO-3166 list.
- **.best** - request made *11 March 2014* by PeopleBrowser, which proposes to amend contractual language and implement an equitable phased allocation program that will permit the introduction of two-character domains, while still reserving two-letter domains that correspond to the two-letter country code names found on the ISO-3166 list.
- **.ceo** - request made *11 March 2014* by PeopleBrowser, which proposes to amend contractual language and implement an equitable phased allocation program that will permit the introduction of two-character domains, while still reserving two-letter domains that correspond to the two-letter country code names found on the ISO-3166 list.
- **.wiki** - request made *11 March 2014* by Top Level Design, LLC. The proposal requests approval of the release of all two-letter language identifiers used for the language versions of Wikipedia. Wikipedia's codes are all based off the internationally recognized ISO 639-1 and ISO 639-2 lists. The former is made up of 2 letter codes while the latter are 3 letter codes. In the proposal, the registry operator notes that there may be some overlap between the two-character labels proposed to be released, and the country codes on the ISO 3166-1 list. The registry operator states that, "it should be noted that they are directly taken from another internationally developed and recognized list, the ISO 369-1 list of 2-letter language identifiers. As their name implies, both of these lists were developed through the representative and consensus policies of the International Organization for Standardization (ISO), headquartered in Geneva and founded in 1947. Thus, the countries whose ccTLDs may be affected by this initiative, as designated by their ISO 3166-1 list, are already well aware that these ISO 3166-1 identifiers correspond or overlap with an identifier on the ISO 369-1 list; our research shows that this has not been a major issue of concern in the past, and the ongoing, simultaneous use of both lists further implies no such issue."
- **.globo** - request made *5 February 2014* by Globo Comunicação e Participações S.A. The proposal requests approval of the registration of non-two-letter two-character domains, which are domains that are composed by two characters that are not letters or by two characters where only one of the character is a letter, provided they are valid according to RFC 2181 and all other applicable RFCs, STDs and BCPS.

As provided by the [Registry Services Evaluation Policy](#), ICANN has undertaken a preliminary determination on whether the proposals might raise significant competition, security or stability issues. ICANN's preliminary review (based on the information provided) did not identify any such issues for these requests.

To note, in its 27 March 2014 Singapore Communiqué, the GAC noted that it "discussed the Brand Registry Group proposal for a streamlined process under an addendum to the Registry Agreement for the approval of country names and 2-letter and character codes at the second level." The GAC stated that it "has no major concerns about brand owners seeking approval for such names," but that the approval should be "done directly with the countries concerned rather than through a GAC-level operational process." The GAC noted that "individual GAC members could assist with proposals relevant to their particular country if requested," and the GAC suggested that "consideration be given to establishing a register of countries that do not require individual requests to be made." The GAC will be informed of this public comment period.

## Section II: Background

In 2006, .name requested for a limited release of reserved two-character names which ICANN staff performed an initial technical evaluation, and referred the matter to the Registry Services Technical Evaluation Panel (RSTEP) process. The RSTEP panel considered the security and stability impacts of the proposal, which focused on unexpected responses being received from the DNS for both existing and non-existing domains, as well as simply user confusion where the idea of two letter second-level domains is unfamiliar. Based on the report of the RSTEP Panel, internal experts and other public comments, there were no significant security and stability issues related to introduction of the proposal, and the board adopted a resolution on 16 January 2007 to authorize ICANN to amend the .name Registry Agreement to implement the proposed registry services

From 2007 to 2012, ICANN processed various RSEP proposals related to the release of two-character labels for 11 TLDs (.jobs, .coop, .mobi, .biz, .pro, .cat, .info, .travel, .tel, .asia, and .org).

Approving the amendments to the identified Registry Agreements to implement the proposed new registry service described in the six RSEP proposals would be the first of its kind in the new gTLD space.

## Section III: Relevant Resources

- RSEP Webpage: <https://www.icann.org/resources/pages/rsep-2014-02-19-en>
- RSEP Policy: <https://www.icann.org/resources/pages/policy-bd-2012-02-25-en>
- Board Resolution (16 Jan 2007): <https://www.icann.org/resources/board-material/prelim-report-2007-01-16-en>
- RSTEP Report (4 Dec 2006): <https://www.icann.org/en/system/files/files/rstep-gnr-proposal-review-team-report-04dec06-en.pdf> [PDF, 784 KB]
- .globo RSEP Request: [Globo Comunicação e Participações SA Request 05 February 2014](#) [PDF, 18 KB]
- .globo Public Comment Notification: [Letter from Registry Services Team to Rubens Kuhl 16 May 2014](#) [PDF, 435 KB]
- .wiki RSEP Request: [Top Level Design LLC Request 11 March 2014](#) [PDF, 196 KB]
- .wiki Public Comment Notification: [Letter from Registry Services Team to Raymond King 16 May 2014](#) [PDF, 435 KB]
- .kred RSEP Request: [KredTLD Pty Ltd Request 11 March 2014](#) [PDF, 18 KB]
- .kred Public Comment Notification: [Letter from Registry Services Team to Michael Deparini 16 May 2014](#) [PDF, 435 KB]
- .best RSEP Request: [BestTLD Pty Ltd Request 11 March 2014](#) [PDF, 18 KB]
- .best Public Comment Notification: [Letter from Registry Services Team to Michael Deparini 16 May 2014](#) [PDF, 435 KB]
- .ceo RSEP Request: [CeoTLD Pty Ltd Request 11 March 2014](#) [PDF, 18 KB]
- .ceo Public Comment Notification: [Letter from Registry Services Team to Michael Deparini 16 May 2014](#) [PDF, 435 KB]
- Multiple Donuts TLDs RSEP Request: [Binky Lake, LLC Request 09 May 2014](#) [PDF, 19 KB]
- Multiple Donuts TLDs Public Comment Notification: [Letter from Registry Services Team to Jonathon Nevett 16 May 2014](#) [PDF, 470 KB]

## Section IV: Additional Information

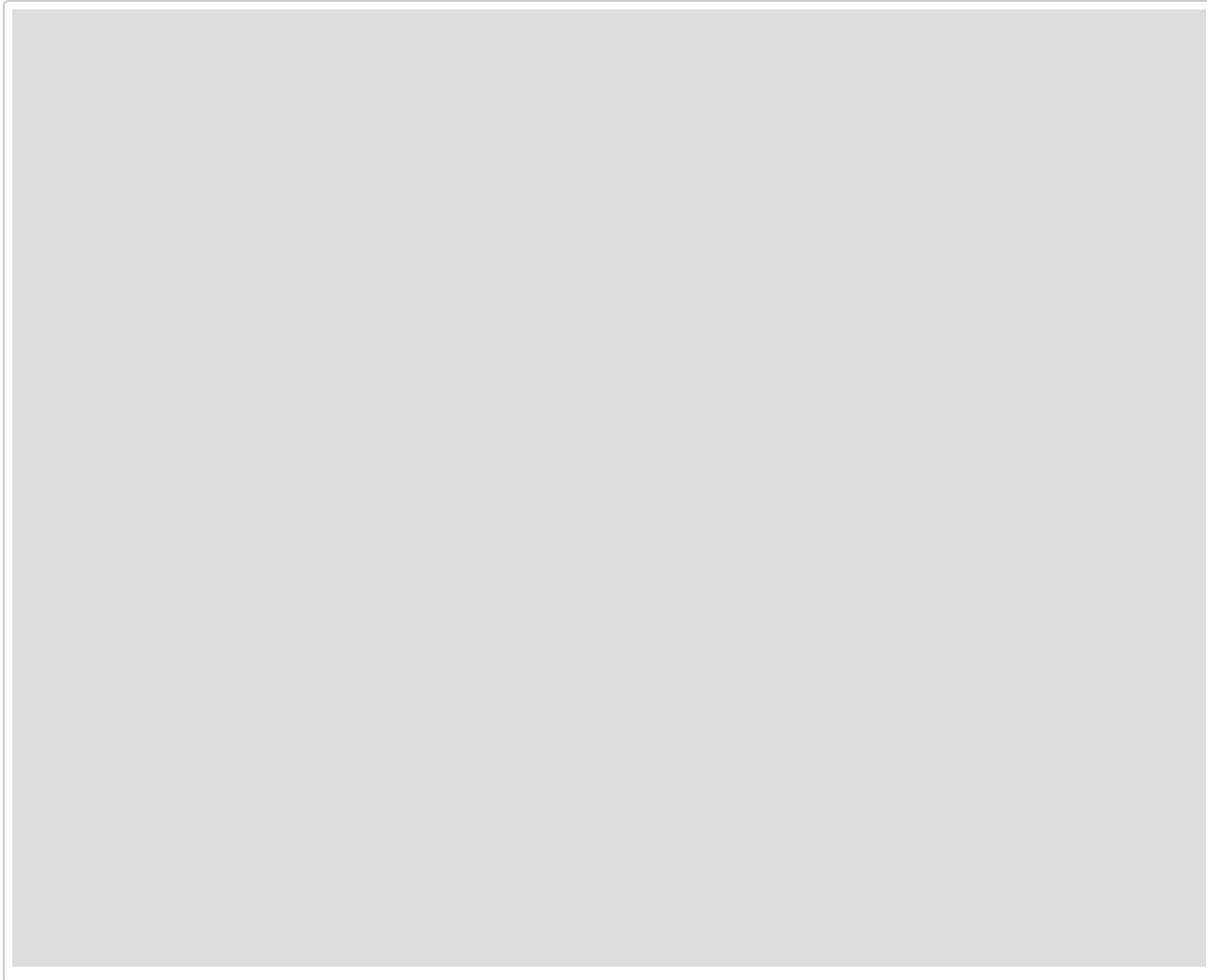
- [.globo Proposed Amendment](#) [PDF, 70 KB]
- [.wiki Proposed Amendment](#) [PDF, 72 KB]
- [.kred Proposed Amendment](#) [PDF, 108 KB]
- [.best Proposed Amendment](#) [PDF, 115 KB]
- [.ceo Proposed Amendment](#) [PDF, 121 KB]
- [Multiple Donuts TLDs Proposed Amendment](#) [PDF, 77 KB]
- [TLD List \(Donuts Entities\) for Two-Character Label Amendment](#) [PDF, 83 KB]

## Staff Contact

Krista Papac  
[krista.papac@icann.org](mailto:krista.papac@icann.org)

## FINAL VERSION TO BE SUBMITTED IF RATIFIED

*Please click [here](#) to download a copy of the pdf below.*



*Please click here to review the reason for abstention from Fatima Cambronero >>*

LACRALO started to discuss this issue very late, when the vote period was already open to vote in ALAC.

In LACRALO we had a lot of confusion about this topic with contradictory positions.

Because of this lack of understanding of this topic and these contradictions some members of LACRALO asked to the ALAC members to vote the statement in a negative way.

I considered that in this scenario my best option was to vote in abstention.

Having detected this confusion we agreed to Dev to invite him today to explain this topic. I hope the region could have a clear understanding of the topic from Dev and Olivier explanations in the call today.

Olivier suggested in the call to explore the idea of having a Webinar on this topic. I support this suggestion.

*Please click here to review the reason for abstention from Rafid Fatani >>*

With regards to the Two-Character Domain names in the New gTLD Namespace, I feel it might confuse 'less ICT literate' users in developing countries that have always expected that two letter TLDs represent some sort of official capacity. However having understood the other side to this argument, I am not completely convinced that there are mechanism in place to support and educate these specific subset of users of this confusion. For this reason I abstained.

---

## **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.*

The At-Large Community has taken note of the many Registry Services Evaluation Process (RSEP) requests submitted to ICANN by many New gTLD Registries applying for exceptions to Specification 5, Section 2 of the New gTLD Registry Agreement (see page 68 of the <http://newgtlds.icann.org/en/applicants/agb/agreement-approved-09jan14-en.pdf> for the text of Specification 5, Section 2)

Many of the RSEP requests are for the release of two character ASCII labels not on the ISO 3166-1 alpha 2 standard. However, the ISO 3166-1 alpha 2 standard is not a static document ; it will be updated to reflect changes to countries and territories. For example, BQ, CW and SX were added to the ISO 3166-1 alpha 2 standard in late 2010 (see [http://www.iso.org/iso/iso\\_3166-1\\_newsletter\\_vi-8\\_split\\_of\\_the\\_dutch\\_antilles\\_final-en.pdf](http://www.iso.org/iso/iso_3166-1_newsletter_vi-8_split_of_the_dutch_antilles_final-en.pdf)). This gives rise to a potential disparity in the implementation of Specification 5, Section 2 where future countries and territories would be treated differently than those countries and territories on today's ISO 3166-1 alpha 2 list.

However, two character ASCII labels at the second level have been made available for some gTLDs and many ccTLDs. Shorter domains are more desirable to potential registrants and two character ASCII labels can be used for alternative meanings than the one for the ISO 3166-1 alpha-2 standard. For these reasons, absent any DNS-related security or stability issues, the ALAC believes that all the restrictions of two character ASCII labels at the 2nd level within a TLD should ultimately be removed, and has no problem with the current exceptions being approved.

---

## FIRST DRAFT SUBMITTED

The At-Large Community has taken note of the many Registry Services Evaluation Process (RSEP) requests submitted to ICANN by many New gTLD Registries applying for exceptions to Specification 5, Section 2 of the New gTLD Registry Agreement (see page 68 of the <http://newgtlds.icann.org/en/applicants/agb/agreement-approved-09jan14-en.pdf> for the text of Specification 5, Section 2)

Two character labels at the second level have been made available for some gTLDs and many ccTLDs. Shorter domains are more desirable to potential registrants and two character ASCII labels can be used for alternative meanings than the one for the ISO 3166-1 alpha-2 standard.

Absent any security or stability issues, the At-Large Community believes there should be no restriction of two character ASCII labels at the 2nd level within the TLD and that Specification 5, Section 2 should be removed.

Many of the RSEP requests are for the release of two character ASCII labels not on the ISO 3166-1 alpha 2 standard. However, the ISO 3166-1 alpha 2 standard is not a static document ; it will be updated to reflect new countries and territories. For example, BQ, CW and SX were added to the ISO 3166-1 alpha 2 standard in late 2010. ([http://www.iso.org/iso/iso\\_3166-1\\_newsletter\\_vi-8\\_split\\_of\\_the\\_dutch\\_antilles\\_final-en.pdf](http://www.iso.org/iso/iso_3166-1_newsletter_vi-8_split_of_the_dutch_antilles_final-en.pdf)).

If RSEP requests are approved by ICANN and the registries make available two character ASCII labels not on today's ISO 3166-1 alpha 2 list, what happens when future countries and territories with new 2 character codes assigned by ISO want the same protections as per Specification 5, Section 2 and find such codes already allocated by the registries?

Similarly, how would the names of future countries and territories be protected as per Specification 5, Section 4 (Country and Territory Names) of the New gTLD Registry Agreement?

Methods of addressing this disparity of treatment between current and future countries and territories should be established before such RSEP requests are approved by ICANN.