

At-Large Use of Country and Territory Names as Top-Level Domains 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
09 Oct 2015	Use of Country and Territory Names as Top-Level Domains	ADOPTED 15Y, 0N, 0A	Main penholder: Maureen Hilyard In consultation with: Cheryl Langdon-Orr	28 Sep 2015	05 Oct 2015	22 Oct 2015 ALAC & Regional Leadership Wrap-Up Session	22 Oct 2015 ALAC & Regional Leadership Wrap-Up Session	22 Oct 2015	Glen de Saint G�ry Glen@icann.org Lars Hoffmann lars.hoffmann@icann.org	AL-ALAC-ST-1015-03-00-EN

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Dear SO/AC Chair,

As you may be aware, 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. Please note that the scope of 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-UCTN 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.

To help the CWG-UCTN in its discussion on three-character codes, you will find below a number of questions; it would be very helpful to the Group if you could provide feedback on some or all questions raised. Please do not hesitate to supply any additional comments you may have on three-letter codes, as long as they are within the scope of work of the CWG (see above).

Please send your comments to Lars Hoffmann (lars.hoffmann@icann.org), who is part of the CWG's staff support team, by Friday 9 October 2015. If you cannot submit your input by that date, but you would like to contribute, please let us know when we can expect to receive your contribution so we can plan accordingly.

Your input will be very much appreciated.

With best regards,

Heather Forrest, GNSO (Co-Chair)

Carlos Gutiérrez, GNSO (Co-Chair)

Annebeth Lange, ccNSO (Co-Chair)

Paul Szyndler, ccNSO (Co-Chair)

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Questions by the CWG-UCTN on 3-character codes with regard to the use of country and territory names as top-level domains

1. In future, should all three-character top-level domains be reserved as ccTLDs only and be ineligible for use as gTLDs? What would be the advantage or disadvantage of such a policy?
2. In future, should all three-character top-level domains be eligible for use as gTLDs as long as they are not in conflict with the existing alpha-3 codes from the ISO 3166-1 list; i.e. the three-character version of the same ISO list that is the basis for current ccTLD allocation? What would be the advantage or disadvantage of such a policy?
3. In future, should three-character strings be eligible for use as gTLDs if they are not in conflict with existing alpha-3 codes from the ISO 3166-1 list and they have received documentation of support or non-objection from the relevant government or public authority? What would be the advantage or disadvantage of such a policy?
4. In future, should there be unrestricted use of three-character strings as gTLDs if they are not conflicting with any applicable string similarity rules? What would be the advantage or disadvantage of such a policy?
5. In future, should all IDN three-character strings be reserved exclusively as ccTLDs and be ineligible as IDN gTLDs? What would be the advantage or disadvantage of such a policy?
6. In future, should there be unrestricted use of IDN three-character strings if they are not in conflict with existing TLDs or any applicable string similarity rules? What would be the advantage or disadvantage of such a policy?
7. Do you have any additional comments that may help the CWG-UCTN in its discussion on three-character strings as top-level domains?

FINAL VERSION TO BE SUBMITTED IF RATIFIED

[Click here to download the document below.](#)

FINAL DRAFT VERSION TO BE VOTED UPON BY THE ALAC

ALAC Statement on the Use of Country and Territory Names as Top-Level Domains

In putting this statement together, the ALAC appreciates the contributions that have been made by members of the At-Large Community. The statement reflects the many viewpoints that arose out of the consultation and discussions.

Consensus within the community was that all 3-character TLDs should not be reserved solely for ccTLDs but there was a split as to whether there was any merit in reserving 3-letter codes for use by ccTLDs at all.

If 3 letter codes were to be used for country codes, the same standard that was applied to the 2-letter codes should also be applied to 3-letter codes as in the ISO 3166-1 list. ISO alpha-3 codes could be reserved as an alternative standard for country and territory codes in the same way that other standards have been reserved, such as ISO 4217 for currencies and ISO 639 for languages. This would open up the rest of the 3-letter options as gTLDs.

An advantage of such a policy would be for ccTLD operators to have 3 character ccTLDs that may be marketed as complementary to two character ccTLDs. Reserving all 3-letter ccTLDs would allow for future changes to the ISO 3166 alpha-3 to be reflected on the countries and territories being designated with new codes. The disadvantage of such a policy is that it blocks future 3-letter ccTLDs for use as possible gTLDs. There is also a risk of end-user confusion as to what policies would apply to the different TLDs. gTLD registries have contracts with ICANN which stipulate certain conditions that must be met (RAA, WHOIS, PICs, etc) and enforce such policies via contractual compliance; ccTLDs don't have any such contracts with ICANN and can implement any policy as the ccTLD administrator wants.

As an alternative, 3-letter codes listed as ccTLDs in ISO 3166-1 could be made available as gTLDs as long as they did not conflict with existing alpha-3 codes from the ISO 3166-1 list or were not marketed or used as pseudo-ccs. Policing or enforcing this could be problematic. It was also noted that the ISO 3166 alpha-3 (and alpha-2 for that matter) codes themselves are not static documents, as they are updated to reflect changes to countries and territories. Hence, there is a risk that a new country or territory can be allocated a new 3-letter code that could be taken by a gTLD. This would give rise to newer countries and territories being treated differently from existing countries. A new country or territory could be "locked out" of the use of its 3 character code, whilst older countries retained the use of theirs. If such governments or public authorities feel they are better recognized or identified by three character codes already in the ISO 3166-1 alpha-3, such entities could file objections to their use as gTLDs via their GAC representatives or apply to the 3166-MA which assigns country code elements. Consultation with the relevant government/public authority would be prudent.

There are already examples where 3-letter country codes are currently being used as gTLDs by other organisations (eg .com, as COM is the ISO 3166-1 alpha 3 code for Comoros). Current exceptions to the reservation standard did not invalidate the standard moving forward but there must be caution in creating exceptions which could diminish trust in ICANN and subsequently trust in the stability of the DNS.

There was an opposing view that there is no merit in reserving 3-letter codes due to several reasons. First, current 3-letter country codes are not widely used and some organisations are already using country codes other than the ISO ones. The IOC (International Olympic Committee) and the FIFA (Fédération Internationale de Football Association) use other codes. For example, the ISO code for South Africa is ZAF while IOC and FIFA use RSA; whereas the ISO and FIFA code for Barbados is BRB, IOC uses BAR. Thus if ISO 3166-1 codes were reserved, would one need to reserve IOC & FIFA codes too? Second, as every geographical area has a 2-letter country code and there are plenty of 2-letter codes remaining, countries may not need to use their assigned 3-letter code as well. The call by the opposing group was to open the 3-letter codes to all, and to maintain the 2-letter codes for ccTLDs.

While some 3-letter country codes are easily identifiable as referring to specific countries and territories, there are still other country codes that would also be very desirable as 3-letter gTLDs. A reserved list would restrict access to good codes for gTLDs, especially when they were unlikely ever to be used as ccTLDs.

The ISO 3166-1 alpha-3 list does not use IDN characters and it is not clear if a definitive list of 3 character IDN strings exists that could be used to represent countries and territories. Blocking all 3 IDN characters would likely delay the expansion of IDN gTLDs. If there are 3 character IDN strings that represent a geographic name (the name of a country, territory, or state names as in the current Applicant Guidebook), then such strings should be rejected as gTLDs as per the Applicant Guidebook. As ICANN has decided that IDN ccTLDs will be delegated to the same registries as hold their existing ccTLDs, it is recommended that this precedent should be referred to when the delegation of alpha-3 codes arises.

There were opposing views as to the appropriateness of either the GNSO or the ccNSO as the manager of the 3-letter country/territory codes. Some resistance was expressed with regards to the GNSO taking charge of Alpha-3 codes in competition with Alpha-2 codes run by the ccNSO.

With regards to the many arguments for and against the reservation of 3-letter ccTLDs with the potential for creating much confusion amongst the user community, there was very strong agreement among the At-Large respondents that there is a need for a moratorium where a full evaluation should be made of the potential impacts of the current expansion of the existing new gTLD programme. It has also been recommended, in order to increase user confidence in navigating the enlarged domain space, that along with a time-framed moratorium, promotional and educational resources and activities related to the introduction of the new gTLDs be developed in areas (geographical, political, social, economic, etc) that were not served well in the first run.

FIRST DRAFT SUBMITTED

Version 3 - 30 Sep 2015

Consensus within the At-Large community was that all 3-character TLDs should not be reserved solely for ccTLDs but the community was split as to whether there was any merit in reserving 3-letter codes for use by ccTLDs at all.

If 3 letter codes were to be used for country codes, the same standard that was applied to the 2-letter codes should also be applied to 3-letter codes as in the ISO 3166-1 list. ISO alpha-3 codes could be reserved as an alternative standard for country and territory codes in the same way that other standards have been reserved - ISO 4217 (for currencies) and ISO 639 (for languages). This would open up the rest of the 3-letter options as gTLDs.

An advantage of such a policy would be for ccTLD operators to have 3 character ccTLDs that may be marketed as complementary to two character ccTLDs. If the ISO 3166 alpha-3 codes are applied, reserving all 3-letter ccTLDs would allow for future changes to the ISO 3166 alpha-3 to reflect changes to countries and territories being designated with new codes. The disadvantage of such a policy is that it blocks any future 3-letter TLDs for use as possible gTLDs. There is a risk of end-user confusion as to what policies would apply to the different TLDs especially as gTLD registries have contracts with ICANN which stipulates certain conditions that must be met (RAA, WHOIS, PICs, etc). ICANN enforces such policies via contractual compliance. ccTLDs don't have any such contracts with ICANN and can implement any policy as the ccTLD administrator wants.

As an alternative, 3-letter codes listed as ccTLDs in ISO 3166-1 could be made available as gTLDs as long as they did not conflict with existing alpha-3 codes from the ISO 3166-1 list or were not marketed or used as pseudo-ccs. Policing or enforcing this could be problematic but it was also noted that the ISO 3166 alpha-3 (and alpha-2 for that matter) codes themselves are not static documents. They are updated to reflect changes to countries and territories. So there is a risk that a new country or territory can be allocated a new 3-letter code that could be taken by a gTLD. This would give rise to newer countries and territories being treated differently from existing countries, with a new country or territory "locked out" of the use of their 3 character code whilst older countries retaining the use of their 3-letter code. If such governments or public authorities feel they are better recognized or identified by a three character code that is already in the ISO 3166-1 alpha-3, such entities could file objections to its use as a gTLD via their GAC representatives or apply to the 3166-MA which assigns country code elements. Having support and non-objection in hand from the relevant government/public authority would be prudent.

There are already examples where 3-letter country codes are currently being used as gTLDs by other organisations (eg .com). Current exceptions to the reservation standard did not invalidate the standard moving forward but there must be caution in creating exceptions which could diminish trust in ICANN and subsequently trust in the stability of the DNS.

There was an opposing view that there is no merit in reserving 3-letter codes, firstly because current 3-letter country codes are not widely used and often as not countries use codes other than the ISO ones, e.g ANG for Angola. Secondly, as every geographical area has a 2-letter country code and there are plenty of 2-letter codes remaining, countries may not use their assigned 3-letter code as well. The call by this group was to open the 3-letter codes to all, and maintain the 2-letter codes for ccTLDs.

While some 3-letter country codes are easily identifiable as referring to specific countries /territories and others less so, there are still others that would be very desirable as 3-letter gTLDs. A reserved list would restrict access to good codes for gTLDs even if they were unlikely ever to be used as ccTLDs.

The ISO 3166-1 alpha3 list doesn't use IDN characters and its not clear if there exists a definitive list of 3 character IDN strings that could be used to represent countries and territories. Blocking all 3 IDN characters can likely delay the expansion of IDNs gTLDs. If there are 3 character IDN strings that represent a geographic name (the name of a country or territory, permutations thereof and state names as in the current Applicant Guidebook) then such strings should be rejected as gTLDs as per the Applicant Guidebook. However, guidance from the At-Large IDN WG would be helpful. As ICANN has decided that IDN ccTLDs will be delegated to the same registries as hold their existing ccTLDs, it is recommended that this precedent should be referred to when the delegation of alpha-3 codes arises.

There were opposing views as to the appropriateness of either the GNSO or the ccNSO as manager of the 3-letter country/territory codes, but some resistance was expressed with regards to the GNSO taking charge of Alpha-3 codes in competition with Alpha-2 codes run by the ccNSO.

With regards to the many arguments for and against the reservation of 3-letter ccTLDs with the potential for creating much confusion amongst the user community, there was very strong agreement among the At-Large respondents that there is a need for a moratorium where a full evaluation should be made of the potential impacts of the current expansion of the existing new gTLD programme. It has also been recommended, in order to increase user confidence in navigating the enlarged domain space, that along with a time-framed moratorium, promotional and educational resources and activities related to the introduction of the new gTLDs be developed in areas (geographical, political, social, economic, etc) that were not served well in the first run.

Version 2 - 29 Sep 2015 >>

Consensus within the At-Large community was that all 3-character TLDs should not be reserved solely for ccTLDs but the community was split as to whether there was any merit in reserving 3-letter codes for use by ccTLDs at all.

If 3 letter codes were to be used for country codes, the same standard that was applied to the 2-letter codes should also be applied to 3-letter codes as in the ISO 3166-1 list. ISO alpha-3 codes could be reserved as an alternative standard for country and territory codes in the same way that other standards have been reserved - ISO 4217 (for currencies) and ISO 639 (for languages). This would open up the rest of the 3-letter options as gTLDs.

As ICANN has decided that IDN ccTLDs will be delegated to the same registries as hold their existing ccTLDs, it has been recommended that this precedent should be referred to when the delegation of alpha-3 codes arises.

There was a view that there is no merit in reserving 3-letter codes, firstly because current 3-letter country codes are not widely used and often as not countries use codes other than the ISO ones, e.g ANG for Angola. Secondly, as every geographical area has a 2-letter country code and there are plenty of 2-letter codes remaining, countries may not use their assigned 3-letter code as well. The call by this group was to open the 3-letter codes to all, and maintain the 2-letter codes for ccTLDs.

While some 3-letter country codes are easily identifiable as referring to specific countries /territories and others less so, there are still others that would be very desirable as 3-letter gTLDs. A reserved list would restrict access to good codes for gTLDs even if they were unlikely ever to be used as ccTLDs.

As an alternative, 3-letter codes listed as ccTLDs in ISO 3166-1 could be made available as gTLDs as long as they were not marketed or used as pseudo-ccs, although it was recognised that policing or enforcing this could be problematic. To reserve some 3-letter codes and not others could create consumer confusion and cause issues to be raised later on.

There are already examples where 3-letter country codes are currently being used as gTLDs by other organisations (eg .com). Current exceptions to the reservation standard did not invalidate the standard moving forward but creating exceptions could diminish trust in ICANN and subsequently trust in the stability of the DNS.

There were opposing views as to the appropriateness of either the GNSO or the ccNSO as manager of the 3-letter country/territory codes, but some resistance was expressed with regards to the GNSO taking charge of Alpha-3 codes in competition with Alpha-2 codes run by the ccNSO.

There was very strong agreement among the community that there is a need for a moratorium where a full evaluation should be made of the potential impacts of the current expansion of the existing new gTLD programme. It has also been recommended to increase user confidence in navigating the enlarged domain space that along with a time-framed moratorium, promotional and educational resources and activities related to the introduction of the new gTLDs be developed in areas (geographical, political, social, economic, etc) that were not served well in the first run.

Version 1 - 28 Sep 2015 >>

Consensus within the At-Large community was that all 3-character TLDs should not be reserved solely for ccTLDs but the community was split as to whether there was real merit in reserving 3-letter codes for use only by ccTLDs.

It was felt that the same standard that was applied to the 2-letter codes should also be applied to 3-letter codes used exclusively for country codes as in the ISO 3166-1 list. ISO alpha-3 codes should be reserved as an alternative standard for country and territory codes in the same way that other standards have been reserved - ISO 4217 (for currencies) and ISO 639 (for languages). This would open up the rest of the 3-letter options as gTLDs.

While some 3-letter country codes are easily identifiable as referring to specific countries/territories and others less so, it was also recognised that there are still others that would be very desirable as 3-letter gTLDs. There are already examples where 3-letter country codes are currently being used as gTLDs by other organisations (eg .com, where COM is the code for Comoros Islands being the most notable). It was noted that current exceptions to the reservation standard did not invalidate the standard moving forward but creating exceptions could diminish trust in ICANN and subsequently trust in the stability of the DNS.

One IDN operator believes that reserving 3-letter IDN and other ccTLDs will help to strengthen the position of ccTLD operators, and enable them to be legitimately represented within the ICANN system. As ICANN has decided that IDN ccTLDs will be delegated to the same registries as hold their existing ccTLDs, it has been recommended that this precedent should be referred to when the delegation of alpha-3 codes arises.

The opposing view proposed that as every geographical area has a 2-letter country code and there are plenty of 2-letter codes remaining, countries may not want to be bothered with using an assigned 3-letter code as well. The call by this group was to open the 3-letter codes to all, and maintain the 2-letter codes for ccTLDs. It was raised that while we might be trying to establish some consistency within the standard, to reserve some 3-letter codes that might never be used and not others could create consumer confusion and cause issues to be raised later on.

While recommending that 3-letter codes should be opened up as gTLDs it was also suggested that those 3-letters that are listed for ccTLDs in ISO 3166-1 might be used but must not be marketed or used as pseudo-ccs. Policing or enforcing this however would be problematic, so that even if restricting good codes for gTLD use when they were unlikely ever to be used as ccTLDs, might not be worth the hassle of creating a reserved list.

It was suggested by a couple of respondents that offering 3-letter codes could encourage further power play between governments and the GNSO. It was suggested that governments have zero obligation to honour the GNSO and that the GNSO needs to demonstrate that it deserves the trust of the world's governments. This is not helped when it appears that the GNSO is making a "land-grab" on 3-letter country codes - eroding trust even faster. Although several respondents agreed to the opening up of ccTLDs as gTLDs there was still some reticence about 3-letter country codes being run under the GNSO in competition with Alpha-2 codes being run by the ccNSO. This would be inviting government intervention. As the ccNSO does not have all ccTLD managers as members, they too would not have any authority over 3-letter country codes.

There was very strong agreement among the community that there is a need for a moratorium where a full evaluation could be made of the potential impacts of the current expansion of the existing new gTLD programme. It has also been recommended to increase user confidence in navigating the enlarged domain space that along with a time-framed moratorium, promotional and educational resources and activities related to the introduction of the new gTLDs be developed in areas (geographical, political, social, economic, etc) that were not served well in the first run.