

Report of Public Comments

Title:	Introduction of Two-Character Domain Names for .JETZT, .GLOBAL, .NEUSTAR, .KIWI, .BERLIN		
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Prepared By:	ICANN Staff		
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Section I: General Overview and Next Steps

General Overview

ICANN received five (5) Registry Services Evaluation Policy (RSEP) requests from the five (5) Registry Operators noted below to allow for the introduction of two-character domain names in the New gTLD namespace.

Proposal	TLD	Registry Name	Documents
2014052	berlin	dotBERLIN GmbH & Co. KG	dotBERLIN GmbH & Co. KG Request 1 September 2014
2014051	kiwi	DOT KIWI LIMITED	DOT KIWI LIMITED Request 27 August 2014
2014050	global	Dot Global Domain Registry Limited	Dot Global Domain Registry Limited Request 22 August 2014
2014049	neustar	NeuStar, Inc.	NeuStar, Inc. Request 21 August 2014
2014046	jetzt	New TLD Company AB	New TLD Company AB Request 6 August 2014

These RSEP requests include a total of five (5) New gTLDs and were posted for public information on the RSEP webpage, available at <https://www.icann.org/resources/pages/rsep-2014-02-19-en>.

In accordance to Section 2.4 of the [RSEP](#), ICANN conducted its preliminary determination and concluded that the proposed Registry Service did not raise significant Security or Stability or competition issues (as defined in Section 1.3 and 1.4 of the RSEP), with each of the respective RSEP requests above.

On 12 September 2014, ICANN posted each proposed Registry Agreement amendments for public comment as the implementation of the Registry Service requires a material change to each respective Exhibit A of the Registry Agreement.

On 24 October 2014, the public comment forum closed for community input to the proposed Registry Agreement amendments, resulting in a total of four (4) comments. No commenters commented on specific requests of the registries, but rather, focused their comments on the general concept of whether or not two-character domain names should be released.

Next steps

Given the necessary consideration and balancing of the interests of all affected parties, including countries, registries, registrants, and end-users, and while being mindful of other public comment periods on this topic, ICANN carefully considered all the contributions it received as well as the work within the GAC who considered the matter at the ICANN 51 meeting in Los Angeles. Please refer to the [Los Angeles Communiqué](#) as well as the recent correspondence between the GAC and the ICANN Board on this topic:

- <https://www.icann.org/resources/correspondence/dryden-to-crocker-2014-08-08-en>
- <https://www.icann.org/resources/correspondence/crocker-to-dryden-2-2014-09-02-en>
- <https://www.icann.org/resources/correspondence/dryden-to-crocker-2014-09-10-en>

In the GAC's [Los Angeles Communiqué](#) (15 October 2014), the GAC noted it was "not in a position to offer consensus advice on the use of two-character second level domain names in new gTLD operations, including those combinations of letters that are also on the ISO 3166-1 alpha 2 list." The GAC also noted that, "[i]n considering these RSEP requests and consistent with the Applicant Guidebook, the GAC considers that the public comment period is an important transparency mechanism, and in addition asks that relevant governments be alerted by ICANN about these requests as they arise."

On 16 October 2014, the ICANN Board [resolved](#) that the proposed registry service for the release of two-character domains in the gTLD namespace does not create a reasonable risk of a meaningful adverse effect on security and stability, and the Board authorizes the President and CEO, or his designee(s), to develop and implement an efficient procedure for the release of two-character domains currently required to be reserved in the New gTLD Registry Agreement, taking into account the GAC's advice in the Los Angeles Communiqué.

Accordingly, ICANN is working to develop a mechanism to authorize those two-character RSEP requests that have completed the public comment period and implement an efficient approach to release future two-character domain names in accordance to the ICANN Board resolution.

Section II: Contributors

At the time this report was prepared, a total of four (4) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee (ALAC)	ICANN At-Large Staff	ALAC
Brand Registry Group (BRG)	Philip Sheppard	BRG
Business Constituency (BC)	Steve DelBianco	BC

Individuals:

Name	Affiliation (if provided)	Initials
Michele Neylon	Blacknight Solutions Hosting & Colocation, Domains	MN

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

Out of the four (4) comments received, all of them support the release of two-character domain names in the new gTLD namespace. No comments were received on specific requests of the registries, but rather, focused their comments on the general concept of whether or not two-character domain names should be released. Some of the commenters also suggested implementation of certain processes for the release of two-character domain names.

1) Regarding the proposed introduction of two-character domains in general

- “There are no technical reasons to block two-character domain names. While a large number of ccTLDs currently have policy restrictions with respect to 2 character (and 2 letter) domain names these restrictions are not universal. Many country codes do not impose any such restriction and, to the best of my knowledge, either never did or if they did they removed it at some point in their history.” (MN)
- “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.” (ALAC)
- “As observed by the Governmental Advisory Committee (GAC) in its Los Angeles Communiqué,

two-character second-level domain names are in widespread use in legacy gTLDs and have not affected the security, stability or resiliency of the DNS. Further, there are no widespread reports or complaints from governmental authorities that the use of two-character ASCII labels (including those that correspond to a ISO 3166-1 alpha-2 listing) in legacy gTLDs has resulted in consumer confusion with assigned or in-use ccTLDs.” (BC)

- “There is a high demand from end users for two character codes to assist in user-friendly navigation in order to navigate the user to a web-page of the appropriate country and language. A number of countries have expressly welcomed the development of geo-targeted content by .brand TLDs. The release of two-character codes within the Registry would provide a clear platform upon which to develop and showcase content targeted toward specific national economies or language groups. Two-character labels to provide geo-targeted content will correspond to the ISO 3166-1 alpha-2 Countries list. Introducing another system of codes for the comparable navigational purpose would add to user confusion.” (BRG)

2) Implementation concerns and proposals

A few concerns were expressed with respect to implementation of the introduction of two-character domain names. The BC suggested that, “Once any two-character label (including those on the ISO 3166-1 alpha-2 list which are released with the permission of governments and country-code managers) are released for registration, they must be subject the same Rights Protection Mechanisms as any other second-level registration in the TLD in question (including the option to block as available).” Additionally, the BC commented that “Registry Operators must, at a minimum, provide standard Sunrise and Trademark Claims Services to protect brands who may own a Trademark in a two-character label, such as an acronym.”

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

Over the past six months, registry operators representing 207 new gTLDs have submitted requests pursuant to the Registry Services Evaluation Policy (RSEP) requesting the release of various combinations of two-character domain names, including: (a) number-number combinations; (b) letter-letter combinations not currently in use by a ccTLD, (c) all letter-letter combinations (regardless of whether the combination is in use by a ccTLD), and (d) letter-number combinations. Amendments to the applicable Registry Agreements to implement the requests have been the subject of public comment.

The comments received articulated arguments in favor of the release of two-character names in the new gTLD.

As highlighted by several comments in favor of the release of two-character domain names, it should be noted that several legacy gTLDs were previously permitted to release, and successfully released, certain two-character domain names, including letter-letter combinations. In 2006,

.name requested a limited release of reserved two-character names, which matter was referred to the Registry Services Technical Evaluation Panel (RSTEP). The RSTEP 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, internal experts and other public comments, no significant security and stability issues related to introduction of the proposal were identified, and the Board adopted a resolution on 16 January 2007 to authorize ICANN to amend the .name Registry Agreement to implement the proposed registry service. From 2007 to 2012, ICANN approved various proposals regarding the release of two-character domain names for 11 gTLDs (.jobs, .coop, .mobi, .biz, .pro, .cat, .info, .travel, .tel, .asia, and .org).

ICANN also notes that comments concerning implementation, and the applicability of Rights Protection Mechanisms. The release of two-character labels currently required to be reserved will be subject to compliance with all other terms of the Registry Agreement, including the applicable RPM requirements.

During ICANN 51, following GAC's [Los Angeles Communiqué](#), the ICANN Board [resolved](#) on 16 October 2014 that the proposed registry service for the release of two-character domains in the gTLD namespace does not create a reasonable risk of a meaningful adverse effect on security and stability, and the Board authorizes the President and CEO, or his designee(s), to develop and implement an efficient procedure for the release of two-character domains currently required to be reserved in the New gTLD Registry Agreement, taking into account the GAC's advice in the Los Angeles Communiqué. As previously noted, in the Los Angeles Communiqué, the GAC stated that it considers the public comment period as an important transparency mechanism and asked ICANN to alert relevant governments about the requests as they arise.