



The Cooperation Council for the Arab States of the Gulf
Secretariat General

Secretary - General's Office

Dear Mr. President of ICANN

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At the outset, let me thank you for giving us the opportunity to comment on the proposed measures for Letter/Letter two-character ASCII Labels. Indeed, soliciting comments from the various stakeholders is crucial and extremely important especially that the new policy will have implications on the current activities and might contradict with national laws.

In this regards, the Cooperation Council for the Arab States of the Gulf (GCC) would like to express its strong opposition to the country codes and country names as second level domains (SLDs) process.

Since that some of the country codes and country names as second level domains code is assigned to GCC countries, and these codes are widely recognized both on and off the Internet as an identifier for them. The GCC is deeply concerned that releasing the two characters of its country codes, country names and any other related codes or names of any part of the GCC at the second level will be misleading and confusing for Internet users. Furthermore, with this process individuals and

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entities could offer services that are assumed by users to comply with GCC countries laws and regulations, while they are not. The current SLDs process will result in very serious consequences at all levels, including abuse, impersonation, fraudulent activity, among others. Putting the countries in a position where they have to do a defensive registration on many new gTLDs is not appropriate and not practical.

Therefore should the SLDs proceed, the GCC requests ICANN to consult the concerned members of the GCC countries before any current or future registrations related to them, and that all such registrations be subject to the pre-authorization of its members.

We thank you again for your understanding and we look forward for your actions based on our aforementioned comments.

Best regards,

**Dr. Abdul Latif bin Rashid Al Zayani
Secretary General of the Gulf Cooperation Council**

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