Telecommunication Standardization Bureau

Ref:	2013-10-387	**Mr Fadi Chehadé**
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cc. : **Mr Sherif Guinena**
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Mr Khashayar Mahdavi
TELNIC CEO
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Dear Mr Chehadé,

The International Telecommunication Union (ITU) would welcome ICANN's assistance to clarify some issues raised by the TELNIC announcement[1] that users can register digit strings in the ".TEL" domain that appear to be of similar length and format as international telephone numbers.

Since ITU first expressed concerns about the TLDs in our letter to ICANN in November 2000, we have recognized that both ICANN and TELNIC made some efforts to restrict all-digit strings as sub-names under the .TEL domain, by allowing the sub-names only with "text-based" or "non-numeric" names, in order to avoid conflict with national or international telephone numbering plans. In particular, TELNIC's application for .TEL domain of March 2004 clearly stated that "[t]he .Tel will not [a]llow numeric-only domain to be registered, and therefore will not conflict with any national or international telephone numbering plan" (New sTLD RFP Application, .tel-Telnic, Part B. Application Form).

In light of this, ITU must express its concern about TELNIC's recent announcement launching an "all numeric .tel domains" service from 15 October 2013. This raises a number of policy, legal, and practical implications on the potential usage of all-digit strings, not only under .TEL domain, but also under any future telephony-related new gTLDs, because of the possible perceived mapping of the ITU-T E.164 numbering plan into the Domain Name System (DNS), without appropriate procedures to ensure that rights of assignees of Recommendation ITU-T E.164 numbers are properly protected.

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[1] http://www.telnic.org/downloads/LongNumericsRelease.pdf

ITU Plenipotentiary Conference Resolution 133 (Rev. Guadalajara, 2010) recognized "the existing role and sovereignty of ITU Member States with respect to allocation and management of their country code numbering resources as enshrined in Recommendation ITU-T E.164", and further instructed the ITU Secretary-General and the Directors of three Bureaux (Telecommunication Standardization, Development, and Radiocommunication) to "take any necessary action to ensure the sovereignty of ITU Member States with regard to Recommendation ITU-T E.164 numbering plans whatever the application in which they are used".
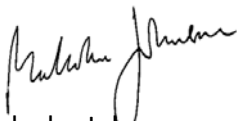
In view of that, ITU-T Study Group 2 (SG2), responsible for implementation and further development of Recommendation ITU-T E.164, during its recent meeting held from 17 - 26 of September 2013 in Geneva, invited the Director of the Telecommunication Standardization Bureau (ITU-T) to initiate a correspondence with ICANN to seek assistance in clarifying the following points:

1) **Is there any validation of the registration of the digit strings when they are similar to:**
    a) **national-only numbers like short codes e.g., 112?**
    b) **national telephone numbers?**
    c) **international ITU-T E.164 numbers?**

2) **How will these digit strings be used?**

3) **The treatment of unallocated and unused numbers (is it possible to register under .tel, numbers that have not been assigned in the ITU-T E.164 international plan and/or the national telephone dialing plans?)**

We are seeking this clarification as the digit strings appear similar to telephone numbers and could be used in a manner similar to telephone numbers, which may confuse customers or cause undue conflicts arising from their use.

We would be grateful for your assistance and we look forward to receiving your clarification on these points.

Yours sincerely,

Malcolm Johnson
Director of the Telecommunication
Standardization Bureau