Report of Public Comments

Title:	Introduction of Two-Character Domain Names for .LUXURY, .WANG, XN--3BST00M, XN--6QQ986B3XL, XN--CZRU2D, XN--45Q11C, .BUILD, .REN, .PIZZA, .RESTAURANT, .GIFTS, .SARL, XN--55QX5D, XN--IO0A7I, and 20 TLDs associated with Top Level Domain Holdings Limited
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Prepared By:	ICANN Staff

Comment Period:		Important Information Links
Comment Open Date:	23 July 2014	Announcement
Comment Close Date:	13 August 2014	Public Comment Box
Reply Close Date:	4 September 2014	View Comments Submitted
Time (UTC):	23.59 UTC	Report of Public Comments

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Section I: General Overview and Next Steps

General Overview

ICANN received seven (7) Registry Services Evaluation Policy (RSEP) requests from the seven (7) Registry Operators noted below to allow for the introduction of two-character domain names in the New gTLD namespace.

Proposal	TLD	Registry Name	Documents
2014039	Multiple TLDs*	Top Level Domain Holdings Limited	Top Level Domain Holdings Limited Request 21 July 2014
2014037	xn--55qx5d xn--io0a7i	Computer Network Information Center of Chinese Academy of Sciences	Computer Network Information Center of Chinese Academy of Sciences (China Internet Network Information Center) Request 17 July 2014
2014035	pizza restaurant gifts sarl	Binky Lake, LLC**	Binky Lake, LLC Request 11 July 2014
2014034	ren	Beijing Qianxiang Wangjing Technology Development Co., Ltd.	Beijing Qianxiang Wangjing Technology Development Co., Ltd. Request 11 July 2014
2014031	build	Plan Bee, LLC	Plan Bee, LLC Request 10 July 2014
2014029	wang xn--3bSt00M xn--6qQ986B3xL xn--czRu2D xn--45Q11C	Zodiac Registry Limited	Zodiac Registry Limited Request 30 June 2014
2014028	luxury	Luxury Partners, LLC	Luxury Partners, LLC Request 27 June 2014

*Note: Top Level Domain Holdings Limited has submitted one (1) RSEP request for twenty (20) gTLDs.
**Note: Binky Lake, LLC has submitted one (1) RSEP request on behalf of Donuts, Inc. for four (4) gTLDs.

These RSEP requests include a total of thirty-four (34) 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 to conclude 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 23 July 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 4 September 2014, the public comment forum closed for community input to the proposed Registry Agreement amendments, resulting in a total of three (3) 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 will carefully consider all the contributions it received as well as the work ongoing within the GAC who intends to consider the matter at the ICANN 51 meeting in Los Angeles. Please refer to the Singapore 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 accordance with Section 2.4.D of the Registry Services Evaluation Policy (RSEP), because the services proposed by Registry Operators require a material change to their respective Registry Agreement, the proposed amendments will be referred to the ICANN Board. The ICANN Board will therefore receive a summary of all public comments submitted for consideration, and decision.

The ICANN community is invited to continue engagement on this topic through further Public Comment periods. Please refer to the respective public comments forums in relation to other Registry requests for the release of two-character domain names:

- https://www.icann.org/public-comments/two-char-new-gtld-2014-06-12-en
- https://www.icann.org/public-comments/two-char-new-gtld-2014-07-08-en
- https://www.icann.org/public-comments/two-char-new-gtld-2014-08-19-en
- https://www.icann.org/public-comments/two-char-new-gtld-2014-09-12-en

Section II: Contributors

At the time this report was prepared, a total of three (3) 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

Individuals:

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

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 three (3) comments received, two (2) of them support the release of two-character domain names in the new gTLD namespace, while one (1) of the comments received oppose the general release of the two-character domain names. None of the commenters raised concerns about number-number and number-letter two character domain names. In addition, 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 comments raise general implementation concerns about introducing two-character domains in the new gTLD namespace, while others raise general concerns about the RSEP process and the handling of requests to release two-character domain names.

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

The arguments are made in opposition of introducing letter-letter domain names in the new gTLD Namespace focused on letter-letter domain name combinations and are the following:

- "To protect ccTLD domain names, all two-letter domain names should stay blocked and reserved." (PC)

- "As new countries pop-up year by year, not just existing country codes combinations, but all two-letter names should be prohibited to be registered." (PC)

The arguments made in favor of introducing some or all two-character domains in the new gTLD

Namespace are the following:

- "Other two-character names besides of two-letter names may be considered to be released." (PC)

- "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)

2) **Implementation concerns and proposals**

A few concerns were expressed with respect to implementation of the introduction of two-character domain names. Specifically, PC suggested that priority rights should be afforded to trademark owners to claim their matching name in a sunrise period, with no premium registration or renewal fees for these names.

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, or in opposition to, the release of all or certain two-character names in the new gTLD. No specific concerns were raised about number-number and number-letter two character domain names.

ICANN takes note of the comments urging ICANN to prohibit the release of two-character domain names that are letter-letter combinations to avoid confusion with country codes. 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 a names for 11 gTLDs (.jobs, .coop, .mobi, .biz, .pro, .cat, .info, .travel, .tel, .asia, and .org).

With respect to the comments regarding the RSEP and the public comment process, at its 9 September 2014 meeting, the ICANN Board began discussing the RSEP/RSTEP process to determine whether there is a way to streamline the approach in order to accommodate the potentially large number of RSEPs and RSTEPs that may occur. At that time, the Board asked the staff to review and analyze the existing RSEP/RSTEP process, including Board involvement in that process, and provide recommendations on how to streamline the process. <https://www.icann.org/resources/board-material/prelim-report-2014-09-09-en>. ICANN is working on the Board's request and appreciates the comments submitted on this matter.

Community discussion on two-character domain names will continue, including at ICANN 51 in Los Angeles, and please monitor the ICANN website for further progress on this subject.