

Report of Public Comments

Title:	Introduction of Two-Character Domain Names for .DEALS, XN--FJQ720A, .CITY, .XYZ, .COLLEGE, .GOP, .TRADE, .WEBCAM, .BID, .HEALTHCARE, .WORLD, .BAND
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Prepared By:	ICANN Staff
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<table border="1"> <tr> <td colspan="2">Comment Period:</td> </tr> <tr> <td>Comment Open Date:</td> <td>8 July 2014</td> </tr> <tr> <td>Comment Close Date:</td> <td>29 July 2014</td> </tr> <tr> <td>Reply Close Date:</td> <td>20 August 2014</td> </tr> <tr> <td>Time (UTC):</td> <td>23:59 UTC</td> </tr> </table>		Comment Period:		Comment Open Date:	8 July 2014	Comment Close Date:	29 July 2014	Reply Close Date:	20 August 2014	Time (UTC):	23:59 UTC	<table border="1"> <tr> <td colspan="2">Important Information Links</td> </tr> <tr> <td colspan="2">Announcement</td> </tr> <tr> <td colspan="2">Public Comment Box</td> </tr> <tr> <td colspan="2">View Comments Submitted</td> </tr> <tr> <td colspan="2">Report of Public Comments</td> </tr> </table>		Important Information Links		Announcement		Public Comment Box		View Comments Submitted		Report of Public Comments	
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Section I: General Overview and Next Steps

General Overview

ICANN received six (6) Registry Services Evaluation Policy (RSEP) requests from the four (4) Registry Operators noted below to allow for the introduction of two-character domain names in the New gTLD namespace.

Proposal	TLD	Registry Name	Documents
2014027	healthcare world band	Binky Lake, LLC*	Binky Lake, LLC Request 25 June 2014
2014024	trade webcam bid	Elite Registry Limited	Elite Registry Limited Request 16 June 2014
2014023	gop	Republican State Leadership Committee, Inc.	Republican State Leadership Committee, Inc. Request 12 June 2014
2014022	xyz college	XYZ.COM, LLC	XYZ.COM, LLC Request 12 June 2014
2014016	city	Binky Lake, LLC*	Binky Lake, LLC Request 6 June 2014
2014015	deals xn--fjq720a	Binky Lake, LLC*	Binky Lake, LLC Request 6 June 2014

*Note: Binky Lake, LLC has submitted three (3) RSEP requests on behalf of Donuts, Inc. for six (6) gTLDs

These RSEP requests include a total of twelve (12) 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 8 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 20 August 2014, the public comment forum closed for community input to the proposed Registry Agreement amendments, resulting in a total of 5 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. One of these comments was received after the close of the public comment forum, and it is included in the following analysis.

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-2014-07-23-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 five (5) 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
UNINETT Norid AS	Annebeth B. Lange	UNINETT
Top Level Design, LLC	Andrew Merriam	TLDesign
At-Large Advisory Committee (ALAC) ¹	ICANN At-Large Staff	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Peter Cerny		PC
Michele Neylon	Blacknight Solutions	MN

¹ The statement submitted on behalf of ALAC was subject to a vote which results are : 13 in favor, 0 against and 1 abstentions.

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 five (5) comments received, three (3) of them support the release of two-character domain names in the new gTLD namespace, while two (2) 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)
- New countries and territories are formed from time to time and to avoid confusion, all two-letter names should be prohibited. (PC, UNINETT)

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)
- Top Level Design, LLC submitted a comment which requests for ICANN to consider the precedent set by legacy TLDs and the efforts made to prove an absence of potential confusion for those seeking ISO 3166-1 names in favor of introducing two-character domains.
- “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. UNINETT suggested that all two-letter names, not only in those in the ISO-3166, should be prohibited until a thorough discussion takes place (UNINETT). It was also recommended that ICANN should work closely with both the GAC and RySG to create a clear process forward accompanied by a timeline (TLDesign).

3) Comments on the RSEP and Public Comment processes

The Registry Operator of .WIKI (Top Level Design, LLC) commented on their two character RSEP request experience. The comments focused on (1) the timing to process their RSEP request, (2) the circumstances of the two-character RSEP requests leading to a public comment period, Board

referral, and an amendment to the Registry Agreement, and (3) the need for ICANN to work closely with both the GAC and RySG to create a clear process forward accompanying a timeline.

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