From: Sivasubramanian M <isolatedn@gmail.com>
Date: Tuesday, 24 July 2012 19:46
To: Lesley Cowley <lesley@xxxx.xx >
Cc: Afilias LaPlante' <rlaplante@xxxx.xx >, Desiree Miloshevic <dmiloshevic@xxxx.xx >
Subject: Clarification on the Application for dotIDN by Nameshop, India.

Dear Lesley Cowley,

Please accept this communication to the ccNSO, if it is in order.

My firm, Nameshop, is one of the twelve new gTLD applicants from India as also one of the three applicants under the Applicant Support Program for Developing Countries.

Nameshop has applied for the string .IDN as an ASCII string. I understand that it was pointed out that this string, as also a few other strings proposed by a large applicant, may be seen as strings that could be viewed as confusable at the country level due to the fact that these are alpha3 country codes.

The applied for string, .IDN is in the generic, global TLD space, and not a geoTLD, and not intended for country level operations. This is an ASCII TLD for the benefit of idn.idn registrants worldwide. Though not filed as a Community TLD, it is a TLD with a larger Community purpose, as the idea and purpose of .IDN is to offer a bridge for the Internationalized Domain Name Registrants to connect to users beyond their own language communities. The proposed gTLD, .IDN supports multiple cultural, linguistic and ethnic communities across the world by helping communities connect to the rest of the world across the barriers of language. This gTLD is intended to serve users of different languages, irrespective of whether the presence of the language is wide or global. Even if the language or script is completely unfamiliar to the global user, with a .IDN ASCII string mapped to the idn.idn name, the global user will find it easier to decipher the internationalized domain name in a script completely unfamiliar to him or her. While Internationalized Domain Names enable users to connect within their language communities locally, the proposed gTLD would connect users from different communities to connect globally. This gTLD would be

of help in furthering the Internet Community's efforts to preserve the Internet as a unified, Global space.

The Applicant Guide book, under section 'Policy Requirements for Generic Top Level Domains' III 3.1 states that "Applied-for gTLD strings in ASCII must be composed of three or more visually distinct characters. Two-character ASCII strings are not permitted, to avoid conflicting with current and future country codes based on the ISO 3166-1 standard." In this section, III.3.1. on what is not permitted, there is no mention of alpha 3 country codes, while this section unambiguously reserves two character ISO standard country codes.

Under the section on 'Geographic Names Review', 2.2.1.4 the guide book states that strings that are country or territory names will not be approved. Here, what is stated as "will not be approved" includes 2.2.1.4.1.i alpha-3 code listed in the ISO 3166-1 standard.

As an applicant applying for a generic ASCII string, that is not a Geographic String or Country Code for country level operations, the title "Geographic Names Review" appeared to be that of a section offering guidelines pertinent only to the applications for geographic names (strings), so the caution on alpha3 ISO codes was completely missed.

I wish to assure that Nameshop as the applicant for .IDN has no intention of positioning this TLD in any manner as a country level TLD to cause any confusion whatsoever. I hope ICANN would take into account the fact that the string + idea + business model makes the application. Viewed together, .IDN is global, with a larger purpose and the idea as conceived to be implemented by a fair business model would indeed add enormous value to ICANN's new gTLD program in the area of IDN implementation.

I request the ccNSO to kindly take note of the above facts.

Thank you.

Sivasubramanian M

Nameshop India