

ccNSO Council Statement: Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)

Date:

The ccNSO Council welcomes the opportunity to provide feedback on the Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Report)¹.

In this document the ccNSO Council wishes to address the following topics:

- Use of 2-character Single Letter, Single Digit Combinations as gTLD strings,
- Proposals and additional work with respect to IDN gTLDs,
- Confusing similarity review under gTLD process.

Use of 2-character Single Letter, Single Digit Combinations as gTLD string

One of the topics in the Report is the current restrictions on the use of certain strings (Reserved Names, section 2.7.1) in the first round of new gTLDs.

From a ccNSO Council perspective, the possible, relevant questions of the Working Group (WG) relate to the reservation of the use of 2-character strings at the top level consisting of Single Letter, Single Digit Combinations.

As noted in the Report, the original “new gTLD” policy recommendations allowed for this type of TLD. However, in the Applicant Guidebook it was disallowed as were any TLDs that contained digits. During the deliberations of the WG, there was some support for this type of TLDs, in the absence of technical issues, though the Group did not reach any agreement.

In the Report, the following questions were raised: *“Should the reservation of those strings be removed? Why or why not? Do you believe that any additional analysis is needed to ensure that these types of strings will not pose harm or risk to security and stability? Please explain.”*

The ccNSO Council would like to highlight the **high risk of confusing similarity** between certain country codes and single character - single digit combinations (for example, .lv and .1v, .it and .1t, .8U and .BU, .CO/co and .CO/c0, etc.).

Given the close relation with two-letter code-elements and issues of confusing similarity, the **ccNSO Council requests the current reservation be maintained.**

IDN gTLDs

The second area that raises concerns relates to IDN (g)TLDs (section 2.7.5) and the proposals and questions contained in the report. Again, we anticipate **possible overlaps and inconsistencies** with the ccTLD Fast Track rules and proposed IDN ccTLD policy.

Topics to be addressed by both the GNSO and ccNSO in this area are:

¹ <https://www.icann.org/public-comments/gtld-subsequent-procedures-initial-2018-07-03-en>

- Use of single and two character IDNs. In case of the Fast Track or IDN ccTLD overall policy, the single or two character string needs to be a meaningful representation of the name of the country or territory.
- Development and impact of IDN variant management framework and related work, which is relevant for both the new gTLDs and IDN ccTLDs.

To streamline the work of the various groups involved in this matter at this stage and to ensure consistency in the approach, considering also the shortcomings of the CCWG Use of names Countries and territories, we suggest the establishment of a small working group to assess the ongoing discussion and efforts. This group should report back to their respective constituencies.

The ccNSO Council believes that this would lead to a **more efficient and productive approach** over time. Examples of a similar approach are:

- The ccNSO-GNSO Councils working party, which coordinates the ccNSO and GNSO Councils' efforts to avoid overlap and create synergies between the CSC Effectiveness Review and IANA Function Review.
- The ccNSO Group on use of Emoji as second level domains, which includes participants from the ccTLD community, SSAC, and ICANN Org. This group does not make any policy recommendations, but informs the community about issues and possible next steps.

Confusing Similarity Review under gTLD Process

Last but not least, the third area that may benefit from our input to the proposals and questions concerns String Similarity Evaluations (section 2.7.4).

During the work to refine the methodology of confusing similarity evaluation under the Fast Track process over the past years, the ccNSO gained considerable experience in this area. The ccNSO is planning a full review of the overall ccTLD IDN policy that will incorporate the knowledge and findings of this work.

As one of the issues might be an increasing discrepancy between the methods, standards and criteria used in the ccTLD and gTLD environments, the ccNSO believes that it would be appropriate to **design a common approach**, i.e. at a minimum ensure that there is mutual understanding of the need for and different methods for evaluation of confusing similarity.

We propose that as a first step the aforementioned small working group is created to analyse the current state of affairs and existing requirements.