

10 April 2025

Dear Kim,

We refer to our meeting on 8 March 2025 in Seattle and thank you for your email of 13 March requesting clarification on the ICANN ccTLD Retirement Policy (the Policy).

For the avoidance of doubt, we would not characterise our meeting as a 'discussion'. Rather, we listened to your concerns and took away your questions for discussion at the Council. Your email of 13 March puts in writing what you are asking and this letter responds to that.

Before we deal with the specific questions raised, it is important to stress:

- a) The Policy is relevant only where a 2-letter code has been delegated in the root zone. The clarification of the standing or otherwise of any parts of ISO 3166-1 in the Policy or in this letter should not be considered in respect to policy matters relating to delegations, transfers, or revocations of ccTLDs; and
- b) Although the Policy was developed by the ccNSO it has been adopted and implemented by ICANN and is therefore an ICANN policy not a ccNSO policy.

In your email you state that the language in the Policy suggests that a triggering event occurs when:

- (i) An ascii entry identified as a ccTLD in the Root Zone database
- (ii) That corresponds to any ISO 3166-1 Alpha 2 Code Element
- (iii) Is deleted from the ISO 3166-1 standard by the ISO 3166-1 Maintenance Agency.

We believe that this is the correct understanding of a triggering event.

You go on to request clarification of the meaning of Alpha-2 Code Elements. It is not the role of the ccNSO to interpret the meaning of terms within ISO 3166-1. That said, when developing the policy, although the ccNSO did consider all of the various categories of code elements it took the view that the policy applied to those code elements that are defined in the fourth edition of the International Standard ISO3166, part 1, i.e. on the *list of country names* or as an *exceptionally reserved code element*, and crafted the policy on that basis.

Accordingly, it is our view that the Policy is relevant only in circumstances where, as a result of action taken by the ISO, a delegated 2-letter code is no longer on the list of country names or an exceptionally reserved code element.

If you have any further questions regarding this letter, please do not hesitate to reach out.

Best regards,

Alejandra Reynoso
ccNSO Council Chair