

Dear GAC Sub-Working Group,

We are writing to you on behalf of the Cross Community Working Group (CWG) on the use of Country and Territory Names. The intension of this input is to direct your attention to the on-going work of this CWG as we believe a constructive exchange between your group and ours will contribute to our respective deliberations and also be beneficial to the wider community by facilitating the development of complimentary policies. The CWG is open to members from all SO/ACs and we would therefore encourage members of the GAC sub-Working Group to join our effort. A broad membership will ensure that the CWG drafts a practical, feasible and workable policy framework that will lead to an effective policy, which will hopefully be acceptable to all Supporting Organizations and Advisory Committees, and serving the interest of all of ICANN's stakeholders.

We would like to take this opportunity to clarify the scope of the CWG, as it diverges from the GAC's Sub-working group for protection of geographic names in next rounds of new gTLDs, and we feel it is important that both you and the wider community are aware of these differences. The CWG has been chartered to review the status of country and territory names under current ICANN policies, guidelines and procedures. Furthermore, the CWG has been asked to provide advice regarding the feasibility of developing a consistent and uniform framework – for country and territory names as top-level domains – that could be applicable across the respective Supporting Organization and Advisory Committees. Finally, should such a framework be deemed feasible, the CWG should provide detailed advice as to the content of said framework.

We would like to stress that our work is limited to representations of names of countries, territories and their subdivisions listed on or eligible to be listed on the Alpha-2 code International Standards for country codes and codes for their subdivisions (ISO 3166-1). All other geographical indicators are considered out of scope. Moreover, our work is limited to top-level domains; second or other level domains are also outside of the scope of the CWG's work.

Based on the specificity of our mission, we feel it appropriate to point to the far-reaching scope of your Report on 'The protection of geographic names in the new gTLDs process'. According to the Final Report of the ccNSO Study Group (ccNSO Study) on the Use Country and Territory Names developing a comprehensive list of all geographic names, as you propose, could lead to more impracticalities than benefits, not least because of the 'incredible level of complexity associated with any attempt to definitely categories country or territory names, especially when such an effort includes multiple languages or scripts.'<sup>1</sup>

The goal of the CWG is to provide a framework for policy development across the country code and generic top-level domain space. Consequently, we are cautious

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<sup>1</sup> ccNSO Study Group on the Use of Country and Territory Names, Final Report, September 2013, see <http://ccnso.icann.org/node/42227>.

about the proposal of the GAC Sub Working Group to amend the Applicant Guidebook prior to the conclusion of the CWG's work, as there could be eventual conflicts that might affect the implementation of any effective policy regarding country and territory names as top-level domains. Furthermore, we would strongly advocate coordination of the work of our respective groups as much as possible to avoid discordant recommendations.

Please note that our CWG has been chartered by the GNSO Council and the ccNSO Council;<sup>2</sup> its membership includes participants from the ccNSO, GNSO, ALAC and the GAC. The ccNSO and GNSO Councils have both been made aware of this communication effort; however, it is important to emphasize this does not represent a formal position of either Council.

In addition, we consider it beneficial to convene a joint face-to-face meeting between the GAC Working Group and our Cross Community Working Group during the forthcoming ICANN 52 Meeting in Singapore. We would suggest a working lunch meeting on Monday, 9 February 2015 and hope this aligns with your agenda. Of course, we would be very happy to consider any alternative time you might suggest.

We hope that you will find our comments useful to your work and are optimistic that this marks the beginning of a fruitful work relationship between our respective groups. We remain at your disposal for any questions or clarifying follow-ups you might have.

Yours sincerely

Annebeth Lange - ccNSO Member, .no  
Co-Chair CWG on Country and Territory Names as top-level Domains

Carlos Raúl Gutierrez – GNSO Council Member, NomCom  
Co-Chair CWG on Country and Territory Names as top-level Domains

Heather Forrest, GNSO Council Member, IPC  
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Co-Chair CWG on Country and Territory Names as top-level Domains

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<sup>2</sup> You can find the Charter here: <https://community.icann.org/x/FrjhAg>

