![ICANN logo] **The Internet Corporation for Assigned Names and Numbers**

ICANN

3 November 2016

Dr. Abdul Latif bin Rashid Al Zayani, Secretary General
Cooperation Council for the Arab States of the Gulf
Riyadh, Kingdom of Saudi Arabia

Dear Dr. Abdul Latif bin Rashid Al Zayani,

Thank you for your correspondence regarding the Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes: https://www.icann.org/public-comments/proposed-measures-two-char-2016-07-08-en. You make reference to both country codes and country names in your correspondence. Country codes and country names are handled distinctly from one another. More information about country names can be found on ICANN's webpage: https://www.icann.org/resources/country-territory-names. If you have questions about the Governmental Advisory Committee (GAC) database list referenced in the webpage, you can contact gacsec@gac.icann.org.

We understand your reference of country codes to mean the subset of two-character domain names that correspond with codes listed on the ISO 3166-1 alpha-2 standard. Two-character domain names at the second level have been a topic of discussion within various groups of the ICANN community, including the Governmental Advisory Committee (GAC).

The registry operator's contract establishes how these second level domain names are treated. Under the New gTLD Registry Agreement, there are two paths by which Registry Operators may release from reservation two-character ASCII labels at the second level. They are:

1) Such two-character label strings may be released to the extent that Registry Operator reaches agreement with the related government and country-code manager of the string as specified in the ISO 3166-1 alpha-2 standard; <u>or</u>
2) Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN.

For two years, ICANN has been working with governments, registries and the ICANN Community to develop an ICANN approval procedure: path 2 above. The GAC has provided its feedback via various communiqués and correspondences, and ICANN has developed its approval procedure taking into consideration consensus-developed advice from the GAC. We note the GAC currently has over 170 members comprised of governments and inter-governmental organizations and 35 observer organizations.

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The first phase of ICANN's approval procedure, the Authorization Process for Release of Two-Character ASCII Labels, was launched in December 2014: https://www.icann.org/resources/two-character-labels. In July 2016, the final phase of developing ICANN's approval procedure was initiated via a community consultation process (https://www.icann.org/resources/pages/two-character-comments-consideration-2015-10-06-en) to finalize a framework containing standardized measures registry operators would implement to avoid confusion with corresponding two-letter country-codes and allow for the release of all two-letter domains, for which you provided feedback in your letter.

The framework was developed from government expressions of concern relating to confusability with country-codes, and registry operator proposals to avoid confusion. The community consultation, conducted via an ICANN public comment proceeding (https://www.icann.org/public-comments/proposed-measures-two-char-2016-07-08-en), closed on 17 August. You may view the report of public comments here: https://www.icann.org/en/system/files/files/report-comments-proposed-measures-two-char-ascii-23sep16-en.pdf. We intend to present the final version of the community-developed framework to the ICANN Board for approval.

We note your concerns regarding potential confusion. The Proposed Measures were created as a means to address confusion, and they are comprised of pre- and post-registration measures that would be implemented concurrently to avoid confusion throughout the lifecycle of a two-letter domain name registration. We believe your concern regarding defensive registrations may be referring to the proposed Exclusive Availability Pre-Registration Period (EARP) measure. We note that, aside from the EARP, there were two other mandatory measures that have been proposed: Registration Policy and Post-Registration Complaint Investigation. These measures would be required in addition to other safeguards already built into the Registry Agreement as well as other measures that registries implement at their discretion.

If concerns arise about the use of a particular domain name, other recourse mechanisms may be available, such as the Abuse Point of Contact, which is used when abuse is suspected.

Finally, it's important to note two-character labels are active in many gTLDs and ccTLDs today without apparent security or stability issues in the DNS.

We hope this information is helpful to you. We encourage you to engage with ICANN's GAC on this topic. Thank you for your participation in ICANN's multistakeholder process.

Sincerely,

Akram Atallah
President, Global Domains Division
ICANN