ICANN
Transcription
New gTLD Subsequent Procedures PDP - Sub Group B
Tuesday, 22 January 2019 at 20:00 UTC

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Operator: Recording has started.

Unidentified Participant: Great. Thank you. Good morning, good afternoon, good evening, everyone. Welcome to the New gTLD Subsequent Procedures PDP Subgroup B call held on Tuesday, the 22nd of January, 2019. In the interest of time, there will be no roll call. Attendance will be taken via the Adobe Connect Room. If you're only on the audio bridge at this time, could you please let yourself be known now? And I see no one only on audio. I would just like to remind everyone, please state your name before speaking for transcription purposes, and please keep your phones and microphones on mute when not speaking to avoid background noise. With this, I will turn it back over to Christa Taylor. Please begin, Christa.

Christa Taylor: Thank you. Good afternoon, or good evening or good morning to everyone. This is Christa Taylor for the record, and thank you for joining our call. As you can see from the agenda, we have four items to cover. The first topic is to review the agenda. Are there any other items we should add to the agenda? And as always, if anything arises during the call, we can add it to the end in Any Other Business. Not seeing any hands or comments. I'll continue on.

Next, if anyone has any updates to their SOI, and if so, could you please let us know now? Seeing no hands and no comments.

The third topic is a discussion of the public comment on section 2.7.1, Reserved Name, or that's the third topic. And then, we will get into the fourth topic, which is we'll conclude with any other business and the next meeting date.

So, based on that, I will jump right into section 2.7.1. I will try to get through this as efficiently as possible as some of it's a little bit lengthy, so please bear with me a little bit. Jumping in onto the general comments, all of these have been added into the relevant sections after this -- the general comment section, so I'm not going to review them here, but I'm going to review them in the relevant sections. So, based on that, I'm just going to jump into 2.7.1.c.1, which is on line nine. And the question on that is Reservation at the top level: keep all existing reservations but add. And pretty much we have everyone agree, although it doesn't really (inaudible), keep all existing reservations but add. I'm expecting something else after that question but I don't see it, so not sure if anyone has the rest of it, or if it's just as it is. But based on that, we have Valideus and Neustar agreeing with it. We have the Registry Stakeholder Group and the Brand Registry Group supporting reviewing the list and reserving only those that pose a security and stability risk. And then, they also -- the Registry Stake (ph) also (ph) suggests supporting reserving only those names where there are stability or security risks. There's a comment there saying to review the reserve for security and stability names and suggesting we take that to the full working group for that review. Comments on 2.7.1.c.1?

Seeing no hands or comments, I'm going to jump to line 14, which is subsection c.1.1. The question is the names for public technical identifiers, i.e. PTI, PUBLICTECHNICALIDENTIFIERS, PUBLICTECHNICALIDENTIFIER. All -- the Brand Registry Group, the Registry Stakeholder Group, and Valideus all support the name. Any questions to that section?

Seeing no hands, no comments, no typing, moving to line 18, Special use domain names, through the procedure described in IETC RFC 6761. The Brand Registry Group, Neustar, and Valideus all agree with the recommendation. Registry Stakeholder Group also agrees, and they add the idea that if ICANN knows of a label will not be delegated should not be possible to apply for that label. Similarly, if a name is not reserved, it should not be added to the list after ICANN receives or processes applications absent of a material change in circumstances.

Then, we have a fairly lengthy comment from the Security and Stability Advisory Committee. Bear with me here a little bit. Their first recommendation is to -- first recommendation, is steps to establish a definitive and unambiguous criteria for determining whether or not a systematically (sic - syntactically) valid domain name label could be at a

top level name in the global DNS. Second recommendation recommends that the scope of the work presented in recommendation one include at least the following issues and questions. Number one refers to ineligible reserves names in ineligible strings listed in section 2.2.1.2.3, which is the two-character ISO 3166 codes. And more recently, the IETF has placed a small number of potentially gTLD strings into a special use domain name registry as described in RFC 676122, any (ph) string that is placed into this registry is expected to be processed in a defined special way that is different from the normal process of DNS resolution.

And it brings the question, Should ICANN formalize in policy the status of the names on these lists? If so, (i), how should ICANN respond to changes that other parties may make through two lists that are recognized by ICANN but are outside the scope of ICANN's direct influence? (ii), how should ICANN respond to a change in recognized list that occurs during a round of new gTLD applications? I guess those two were subsections. Question two, the IETF is example of a group outside of ICANN that maintains a list of special use names. What should ICANN's response be to groups outside of ICANN that assert standing for their list of special names? (3), some names that are not in any formal list are regularly presented to the global DNS for resolution of TLDs. These so-called private use names or independently selected by individuals and organizations that intend for them to be resolved only within a defined private context. As such, they are harmlessly discarded by global DNS. Should ICANN formalize in policy the status of private use names? And if so, (i), how should ICANN deal with private use names, such as corp., home, and mail that already are known to collide on a large scale with formal applications for the same names as new gTLD (sic - ICANN)-recognized gTLDs? And (ii), how should ICANN discover and respond to future collisions between private use names and perceived -- and proposed new ICANN-recognized gTLDs?

With all of these concerns, and I don't think they've really been brought up anywhere else in the document, I'd suggest that we just take this entire section, along with the questions, to discuss with the full working group. If anyone disagrees with that, could you please let me know? And as a comment, certain aspects of SAC 90 were officially adopted by the ICANN Board, and they sent notice to SubPro of the items they adopted. This should be noted in the summary of the public comments just after Take to full group -- working group to discuss. I think we can add that in there for sure, so thank you, Anne, (inaudible) comment. Any other comments or feedback on 2.7.1.c.1.2?

Seeing no comments or typing, going to move on to line 24 with a question, 2.7.1.c.2 with a question, Reservations at the second level: keep all existing reservations but update schedule 5 to include the measures for letter/letter, two-character ASCII labels to avoid confusion

with corresponding country codes adopted by the ICANN Board on the 8th of November 2016. We have -- everyone agrees, including FairWinds Partners, the Brand Registry Group, the Registry Stakeholder Group, Valideus, and the ALAC. The Registry Stakeholder Group provides another idea that, in addition to these measures, authorization was given for the release of letter/number, number/letter, and number/number two-character ASCII combinations, and also two-letter codes which did not correspond to country codes. The authorization to release these terms should be formalized in the recommendations of the PDP, and the base RA for future TLDs should be amended accordingly.

Additionally, we have another concern, which was by Valideus, that a -- I think they refer to five-letter/letter -- I think it means two-letter, but five-letter/letter, two-character ASCII labels remain reserved because they are IGO acronyms. This is a work -- This is work occurring elsewhere in relation, but care should be taken to ensure that they do not fall through the cracks. They should be -- It should be possible for a registry to release these names with the consent of the IGO in question, but no mechanism exists to allow this. So, for both of those comments, I would probably suggest we take this also to the full working group to discuss further. Thanks, Jim, It's five combinations in total. Got it. Thanks. Kristine, I see you have your hand raised. Please go ahead.

Kristine Dorrain: Thanks. This is Kristine Dorrain. Yes, I was also -- I was going to make the same correction Jim made, but I also wanted to note that, while -- excuse me -- the language might be slightly different, the Registry Stakeholder Group comment and the Valideus comment essentially say the same thing. We both talk about codifying the current -- what was in schedule 5 in the new applicant guidebook, and we both talk about those five two-character ASCII labels. So, it's essentially the same, so not really two separate things. I mean, there's -- the sheet shows that only Valideus has a concern, but it's -- the registries and Valideus are essentially aligned there. Thanks.

Christa Taylor: Great. Thanks, Kristine. Donna, please go ahead.

Donna Austin: Thanks, Christa, Donna Austin. So, in relation to the concerns that were acknowledged this is out of scope, that's a comment alongside Valideus in relation to IGO acronyms. Now, that's probably been identified as out of scope because the IGO acronyms is caught up in another PDP so that the curative rights IGO, INGO curative rights. And my understanding is that, once there's a solution in place for that, the Board will release a temporary reservation that exists on -- currently on IGO acronyms. But it might be helpful if we could expand what we mean when we say that we acknowledge it is out of scope.

Christa Taylor: Yes, I didn't actually write that part. I think perhaps your clarification there that's saying we're waiting to hear back on it, and once there is a solution proposed, that the working group should take that into consideration. Does that work?

Donna Austin: I'm not sure, Christa, but I think we need to be clear about why this is out of scope, if it is, because it's being dealt with elsewhere. Then we need to be clear where that elsewhere is, or just be explicit about what we mean by--.

Christa Taylor: --How about we delete it--?

Donna Austin: --(Inaudible) -- yes, maybe. I'll leave that to the group. It's maybe too early, and I expect that's why it's been raised here, but -- because the IGO acronyms does show up in specification 5 of the registry agreement. So, that's probably why it's raised here.

Christa Taylor: Okay. I'm going to propose right now that we just delete that comment in the working doc. And if anyone would -- oh, Julie, I see you have your hand raised. Please go ahead if you have the insight.

Julie Hedlund: Oh yes, thank so much. This is Julie Hedlund from staff. Yes, I think that was something that staff had asserted, and I think that we can just go ahead and take it out for now. I don't think it's reflective -- it's certainly not reflective of this sub-team's discussion. So, if there is concern that that is not accurate at this point, I think it's better that we should take it out, which we can do right now.

Donna Austin: Perfect. Solved.

Christa Taylor: Okay. Seeing no other hands or comments, I'm going to move to the next section, which is on line 30 with the question on c.3. The work track is also considering a proposal to remove the reservation of two-character strings at the top level that consist of one ASCII letter and one number, i.e. .O2 or .3M, but acknowledges that technical considerations may need to be taken into account on whether to lift the reservation requirements for those strings. In addition, some have expressed concern over two characters consisting of a number and an ASCII letter where the number closely resembles a letter, i.e. a zero looking like the letter O or the letter capital-L in the lowercase looking like the number one. We have one concern, which is from the ALAC, avoidance of end-user confusion is paramount consideration to the ALAC, and all practical reasonable measures must be considered and implemented to safeguard the end-user protection principle. We had the Brand Registry Group, supports recommendations but acknowledges the concerns raised regarding confusing strings, and they give an example. And measures should be

employed to identify risk of confusion and, where risks are identified, reserve these strings.

We have INTA, who agrees and also notes a number of brands consist of combination of letters and numbers. Provided there are no technical concerns, they support removing the reservation of letters and numbers at the top level. And then, they go on to say an ASCII letter where the number closely resembles a letter, we believe that these would generally appear sufficiently distinct when typed into a browser, and that if there's a risk, we suggest that any continued reservation of single-letter/single-number combination should be limited to those involving a zero or one in a position which corresponds to letters O and L in an existing ccTLD string, for example n0 for the country code for Norway.

We have the Registry Stakeholder Group with a concern that further technical review of technical considerations, absent of any security or stability risk, and if there is strong support within the community, but they do support the proposal. And then, we finally have Valideus, who says that they agree with the -- unless there is a technical reason not to allow letter/number or number/letter ASCII strings at the top level, we would support the release, with the new idea that, continued reservation on this basis, it should be limited to only those combinations which match an actual country code. Comments, feedback on any of that? Julie, I see you have your hand raised. Is that an old hand?

Julie Hedlund: Sorry, it's old.

Christa Taylor: Okay, thanks. Seeing no comments, I'm going to jump to line 36, which is question e.1. Question is the base registry agreement allows registry operators to voluntarily reserve and activate up to 100 strings at the second level which the registry deems necessary for the operation or the promotion of a TLD. Should the number of names be increased or decreased? Please explain. And are there any circumstances in which exceptions to limits should be approved? Please explain.

I think most of these kind of follow within certain ideas or responses. So, the first one is Jamie Baxter of dotgay, his is a little outside of the norm. He agrees, and then has the idea to -- There should be some flexibility and to support -- to employ elements of the registry business model that offers benefit to either the community members or Internet users, and has the idea that any registry operator's request to exceed 100 strings should be supported with endorsement of some nature that encompasses more than the interests of the registry itself. In the case of community applications, it could be the endorsing organization that offer support for the request.

We then have the geoTLD. Group, .Berlin, and the Hamburg Top-Level-Domain GmbH all agreeing with it, with the -- I guess pointing being geo entities should not -- should have an increase in limit of 1,000 names for them due to governmental entities, their duties, campaigns, sites within the city, and the inventory a city owns, and that the 100 names be lifted to accommodate these special circumstances. Those three comments are the same for those three respondents.

We then have the Brand Registry Group, along with INTA, FairWinds Partners, and Registry Stakeholder Group and Valideus suggesting that all brands should have this limit removed. Neustar adds that, at a minimum, the limit should be changed from cumulative over the life of the gTLD to rolling to allow registry operators to change their operational and promotional domain names as their operational and promotional needs change without exceeding the overall limit. And sorry, that's Neustar. I hope I said that. I think I might have said -- hopefully I did. My apologies if I didn't. And they also go on to support removing the limit for single registrant TLDs, as I noted before, as per spec 13 or spec 9.

We have FairWinds Partner that also goes on to suggest that the names only should be reduced for brands. We have the Registry Stakeholder Group, which also goes along with the same rolling basis idea as Neustar. We have Valideus, as I mentioned, already agrees with the brand. Then, we have two divergent points of view. One is the IPC that believes that the limit of 100 names for promotion of the registry worked well and does not see a need to increase or decrease this amount. However, caution must be taken if these names are released to be registered by a partner other than the registry.

And then, we have LEMARIT saying 100 strings are reasonable and sufficient. Comments to that section? Anne, I see you have your hand raised. Please go ahead.

Anne Aikman-Scalese: Yes, thank you. It's Anne for the transcript. And I think there may be a couple of notations that aren't quite accurate in terms of agreement, because I note, for instance, that on the INTA comments, the INTA comment and the FairWinds comments, and I think one other comment are not really comments that agree with lifting the limit above the 100 names. They are comments that the limit is irrelevant for dotBrands, for single registrant situations. So, I think there's really a different character to INTA, FairWinds, and Valideus from the character of the agreement that's noted for the other public comments. And that's the main thing I think that has to be distinguished, because it otherwise looks like there's this huge consensus here, which I don't think really exists based on the comments I'm reading.

And then, the other thing I would note about it is that the question is should the reserve names 100 strings, should they be increased or decreased. So, I don't think we have anybody saying decreased, but we have three comments related to we like dotBrands only, and then we also have LEMARIT saying keep it at 100. We have IPC saying keep it at 100. So, I think we actually have three subsets of comments here, and that -- and what we've said in the summary is not accurate because it just says agreement, agreement, agreement, agreement, agreement, agreement. So, I guess I would -- I guess I see it as correct in line 47, line 48. I don't think that it's correct as to 44 -- 43, 44 or 46, so I would request that staff take a look at that and maybe revise the agreement part of it, since those comments are more limited. Sorry to run on like that. Thanks.

Christa Taylor: Hi, it's Christa for the record again. No, and you're right, and the question really -- there's a couple of them, where the agreement isn't really clear what it's agreeing when it's more of a descriptive question. So -- and you're right on the INTA and the FairWinds. The Valideus, where it's more of a -- it's meaningless as opposed to there should be a higher volume. So, I agree with you on that, along with the three subset. Kristine, I see you have your hand raised. Please go ahead.

Kristine Dorrain: Hi, thanks, this is Kristine Dorrain for the transcript. So, I have a suggestion, because I think I agree with Anne. The question was should we increase, decrease, or why? And it says "agree." Well, agree with what, increase or decrease? So, I think the right staff response here should be the answer. It should say, in green or whatever colors you want to call it, purple and pink, I don't care, like it should say support increasing or support decreasing, because I think we can say that FairWinds and the Registry and whoever else, Brand Registry, says -- for instance, we say remove the limit, so increase for Brands. And in this case, you can see that they say -- I'm just glancing down -- they specifically say do not decrease. One of them says do not decrease. I think that's the registries. And so, you would say, at a minimum, do not decrease but stay the same also seems to be acceptable to increase, because do not decrease is compatible with increase. I can confirm that. I think that would probably be okay, and Donna can correct me if I'm wrong.

So, I would suggest that we maybe need to table this light section for staff to go through and revise, and then we can revisit it on another call and just make sure we're happy with the way it's been characterized. So, I think this is just a little bit trickier. I agree with Anne. It's not entirely an accurate characterization of the outcome here. Thanks.

Christa Taylor: I think we should request the color pink. Julie, go ahead, please.

Julie Hedlund: Yes, this is Julie Hedlund from staff. Actually, it's not really meant to be a staff designation. This is staff and the sub-team co-chairs need to go through the analysis, but it's really up to the sub-team to decide what is reflective of the comment. So, at this point, we really don't know as staff what we should go back and put in there other than to just look at it again. And remembering that we just have four types of categorizations, agreement, new idea, concerns, or divergence, if it's none of the above, then I think we've indicated that it's either out of scope or it's just a comment, meaning it's not actually -- it's not a comment that says anything to the question. So, we can't say that it is addressing the question. If that's the case here, then we can change it to that. So, I see your point, Kristine, if there's nothing to agree with, for the working groups' edification, we do need to then categorize this somehow. And staff is reluctant to try to guess what that might be, so we'd look for your guidance.

Christa Taylor: Anne, is that a old hand or a new hand? It's the new hand. Please go ahead.

Anne Aikman-Scalese: Yes, thanks, it's a new hand. I don't think it would be accurate to characterize INTA, Valideus and FairWinds' comments as out of scope. I think we might have to admit that the question isn't extremely well-drafted for having sort of a yes or no answer as to agreement. I think we would have to note INTA, FairWinds Partners and Valideus as maybe, I don't know, concerns or something, since I understand that Julie's saying that they have a very limited number of categories. What I think that, as a group, we have to avoid doing in a subgroup is indicating a massive consensus when there is not one, and those comments are definitely within scope. So, I would probably characterize, since we only have four categories, probably characterize them potentially as concerns, or divergence. They could be divergence, because they're really only talking about dotBrands. So, I don't know, maybe the leaders have to decide, but comments are within scope, and they are different. Thank you.

Christa Taylor: Thanks, Anne. I really liked Kristine's idea of saying they are agreed that there's no decrease, and then I think we can probably specify that there seems to be a suggestion that geos have a limit of 1,000, and that brands not have a limit because there is -- it doesn't really apply. And then, for other ones, it seems to be that 100 seemed to be reasonable. But maybe we'll try to draft some language around this and then bring it back to the whole group to review on the next call, if that might be -- I guess works for everyone. Kristine, please go ahead.

Kristine Dorrain: Thanks. This is Kristine. Yes, I think I do support that idea. I like the idea of using the word "divergence" here. I think Anne's right there. We don't have a consensus. We have lots of really great responsive answers that say increased or decreased, and why. So, ultimately, we're not going

to be able to come to a consensus because there isn't one. I think it has to go back to the full working group. And the magic way we do that is to write "divergence," right? So, if all of them had said -- every respondent had said it should be increased to 500, magically everybody agreed, then I think we could say the word "agreement" because, even though the substance wasn't yes or no, we could understand that there was a consensus. Here, there's a variety of different answers which requires, in my opinion, the larger working group's opinion. So, I'm not even sure that we have to go through and formulate any new language, Christa, maybe. Maybe we just use the magic word of divergence, and it goes back to the working group to figure out what the magic number should be based on all of this information. Just a thought.

Christa Taylor: I like magic. Cheryl, go ahead. And if you're talking, Cheryl, I can't hear you. So, Cheryl says, "Exactly, Kristine." Okay, so it sounds like we'll take this to the full working group, and then from there, we can add some more language around that. We all okay with that? See people typing. I'm just going to wait a second. Yes, list divergence, yes. So, I think that's already underway, and it's already in -- it's not in the document quite yet, but we'll make sure it's noted as divergent, and we'll bring it to the full working group. And actually, it's already underway, but it's in green, not red yet, so -- now it's in red. Okay. Cheryl, I'm not sure if you want to speak. Your hand is raised. And gone. Okay.

On to line 49, which is question 2.7.1.e.2. If there are no technical obstacles to the use of two-letter strings at the top level consisting of one letter and one digit, or digits more generally, 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 first four are in agreement, with Valideus, Brand Registry Group, the Registry Stakeholder Group, and INTA. Valideus, I would actually -- I think is more divergent, even though it's noted as agreement, because in response in 2.7.1.c.3, they made the comment do not let IGO acronyms fall through the cracks. And then, they also note includes non-country code matching two characters and the consent of IGO for release was their comments before. So, to me, that's more of divergent.

The Brand Registry Group supports the recommendation with a concern raised regarding confusing string. And suitable measures should be employed to identify risk of confusion and, where risks are identified, reserve these strings. And the Registry (sic - Registrar) Stakeholder Group says it should be removed. Why would there be a distinction if the technical obstacle doesn't exist? And no additional analysis is necessary.

We have INTA that, similar to above, where there's -- provided there are no technical concerns, they support removing the reservation of

combination of letters and numbers at the top level, including two characters or more letter/number combinations. We have the Registry Stakeholder Group has the avoid confusion item, which sees a number of different types of letter/digit combinations. They also note letter/digit, digit/letter, digit/digit, that could be a valid octal numbers, valid decimal numbers, valid hexadecimal numbers, and not a number in neither of these three bases. They see some of these combinations, although not all, having possible confusion with ccTLDs, and they recommend, (1), require acknowledgement from the application that those TLDs might incur more universal acceptance challenges than other ASCII new gTLDs. And for the letter/digit and digit/letter combinations, require applicants to pay for both halves of possible string confusion objections, panel fees coming from ccTLD operators.

Then, we have a whole bunch of comments here. And I'm going to make the suggestion, there's I think one that kind of has a flavor of all of the responses. And if you want to jump to line 66, which is item number 17, it's brought -- the response is by the Latin American and the Caribbean ccTLD organization, and they have four concepts in there which I think kind of apply to all of the other responses. So, I hope to use those kind of ideas to the other responses to help us kind of get through it. So, just going to go through the item number 17 on line 66, which is -- they respond with, in reference to the question, if there are no technical obstacles to the use of two-character strings consisting of one letter and one digit, should they be permitted and registered in future gTLD string application rounds? They believe that two-character strings consisting of one letter and one digit should not be permitted to be registered in future gTLD applications for the following reasons.

Now, this one I would characterize as distinctness (ph) ccTLDs, and that is two-character top-level domains are firmly associated with country code top-level domains and have been created by IANA, the PTI, from two-character codes laid down in ISO 3166-1. The second response, they go on, I would consider an expansion type of idea, where they have ccTLDs have an entirely different policy background to gTLDs. It's entirely foreseeable that the ISO maintenance agency could in future decide to issue two-character country codes including digits, as the ITU already has done. And then, they refer to appendix 2 of the ITU radio regulations.

Then, we have what I would consider avoid confusion, which is homographic issues that were not addressed by the GNSO. And they pose a direct threat to the security and stability of the Internet system of unique identifiers, including ccTLDs that might be caught up in. Some examples are .ci could be C and 1; CL could be C and 1; CO could be C and zero; D and O could be D and zero; N and L could be N and 1; and a small I could be, like, I -- .is could be 1 and S; and finally, L and S, a small, could be confused with .1 and S. And they note, with sans-serif

typefaces, there is considerable risk for consumer confusion and consequent security risks, including phishing attacks.

Then, I go on to disclose kind of the fourth concept, which we're going to see through all these, which is security concerns. And they note, ICANN's core mission is to, quote, "To coordinate the stable operation of the Internet's unique identifier systems," end-quote. The introduction of homonym-conflicted two-character two-level domains would be in direct conflict with that core mission. And the GNL's proposal would (ph) introduce instability to the DNS via visual confusion of strings.

And finally, they kind of end up with this should be unequivocally not ever be permitted in future gTLD application rounds because of the conflict with ccTLD allocation policy and ISO two-character codes, which are external to ICANN as well as a homographic issue subscribed discussed above. So, I'm going to use this kind of as a basis as we review the other ones. So, I hope that makes sense what I'm trying to do, and if not, stop me.

The first one is -- I'm going to apply it to is the Norwegian ccTLD registry, which they have the note of "We should be avoiding confusion. There is a security risk, and the ccTLD distinctiveness should be kept. They also add that a careful analysis to ensure security and stability should be undertaken."

The next comment is from the KT (sic - KJ) domain registry, and all four of those aspects apply in the response, which is to avoid confusion, security and stability concerns, expansion, and the distinctiveness of ccTLDs. We have a comment from Roberto Gaetano with the expansion concern, the distinctive concern, and the security concern. We have one from the APTLD, again with all those exact three concerns - confusion, distinctiveness, and expansion. Same thing with the CENTR, with avoid confusion, security and stability, and distinctiveness. They also give, I think, some of the same examples. That same response -- no, sorry. The next comment is from the Finnish Communications Regulatory Authority, which is the exact same response as the Norwegian comment in item number six. And the items were to avoid confusion, security and distinctiveness concerns.

Then, we have NIC.VI, same idea, to avoid confusion and expansion concerns. And they also add the comment on -- I think ICANN should be able to dictate how a pre-existing third party ought to operate, and it would result -- the result could only lead to balkanization, which I had to look up, which is ineffectual factions. So, I guess it's being very, I guess, little parts of it that would make it more difficult. And sorry, the other part there, which I didn't capture, was the brief history shows Jon Postel saw determining what constituted a country and how it was assigned is best

left to ISO, and that the paper correctly points out that we cannot presume what codes ISO may assign in the future. And that's the expansion idea.

Then, we have Afnic, which uses the same items, which is to avoid confusion, the security concern, the distinctiveness concern. Same with the Registry.si, with confusion, the security and distinctiveness. They also add that we do not believe that additional analysis is needed, as the risk of security and stability of the DNS greatly outweighs any benefits. Then, we have the Namibian Network Information Center, which has the avoid confusion and future expansion ideas, and they also add that, in the future, the ISO may even decide to use and assign the alpha-2 codes containing numerals. That's the expansion idea. Such confusion is not new. There are IDN strings which can cause similar issues. There's no need for doing this, as there's infinite number of possible top-level domains with four or more characters. Their item number five, changes in ICANN policy affecting ccTLDs must be developed by the ccNSO. And the RFC 1591 is clear about two levels, top-level domain names, and we are not opposed to doing away with that RFC.

The next comment is from the participants of the Asia-Pacific Internet Governance, which is exactly the same as the APTLD in item nine, which has the avoid confusion, distinctiveness, and expansion ideas. I already read you the response from the Latin American and Caribbean ccTLD Organization. Then, we have NIC Chile, which addresses the confusion and distinctiveness items that I was referring to. Then, we have the Swedish Internet Foundation, again with the confusion aspect and along with the distinctiveness and security concerns. And they also refer to the CENTR comments, or CENTR referred to before. We have the ccNSO Council, which talks on the confusion aspect of it, and they would like to highlight the risk of -- well, that's the confusion, and that the current reservation be maintained.

Then, we have a whole bunch on line 70, starting with NIC.DO. The NIC -- actually, I'll just go through them individually. So, they're dealing with the confusion and the distinctiveness of ccTLDs aspect. We have another -- and sorry, that was -- all of these are divergent. I'm sure I said that, but just to make sure -- ccTLD.PR is also divergent. Their concern is expansion. Then, we have NIC.PY, divergent, with the confusion and distinctiveness concerns. And if you haven't had a chance to translate that, the translation is they shouldn't be allowed -- not allowed to do ccTLD sign-up policy and two-letter ISO codes, as well as homographic problems.

The geoTLD group, again confusion and distinctiveness, and that is the same between the geoTLD group, .Berlin, and the Hamburg Top-Level Domain GmbH comment, which has -- all those have the same concern

on confusion and distinctiveness, which has carried through the NIC in Panama. Again, it has the exact same translation as NIC.PY on item number 23. Then, we have NIC Mexico with the confusion and distinctiveness concerns. Then, we have NIC from Costa Rica, which is exactly the same as the LACTLD item number 17, which has same items, avoid confusion, distinctiveness, and the security concerns. We have the SIDN with the confusion and distinctiveness concerns, and they also add in a comment with a huge amount of willful and often fraudulent attempts to mislead the public by impersonating domains under ccTLDs with those letters in the same name of their TLD.

We have the Administracion del Dominio .UY for confusion and distinctiveness. Same with the Registries.MX and the AS Domain Registry. All those three have the confusion and distinctiveness concerns, with the AS Domain Registry also supporting the APTLD, the CENTR, the LACNIC and -- which AS Domain Registry fully supports. And finally, we have the Government of India noting the same concepts of confusion and distinctiveness as noted before. Comments on that section? I hope that helps, and I hope it's kind of clear on all of that. Seeing no comments or hands, I think we're okay.

Okay, I'm going to move to line 84, and we can always come back if people have questions. Line 84, section e.3, the question is, in addition to the reservation up to 100 domains at the second level -- or sorry, in addition to the reservation up to 100 domains at the second level, registry operators were allowed to reserve an unlimited amount of second-level domain names and release those names at their discretion provided they released those names through ICANN-accredited registrars. We have two who agree, which is Registry Stakeholder Group and Neustar, suggesting that fixing the language in the report to the allocation of 100 instead of the reservation of 100 names. Then, they oppose the -- setting the limitation on the reservation of names regardless of the TLD type since usage models are not all alike. And they also go on to say the potential to inhibit innovation and oppose having to proceed with sunrise for reserve names since how registrars registries interoperate would make such operations cumbersome. Additionally, the reserve names already have to go through a claims period, allowing trademark misuse to be detected and, in the case of geoTLDs, there are no other mechanisms to reserve names for public services such as street names and et cetera, which have importance to the local public and local government.

Neustar has the comment does not support limiting the same thing for any type of TLD, and there are a myriad of reasons for names to be reserved, including the security and stability, and limitations on reserve names compromises this. We have the Registry (sic - Registrar) Stakeholder Group that also has the concern that -- a promise that this isn't happening. In many cases, the rights to the name are being sold

direct to consumer customer with an exception that the registrar may help manage/resolve domain. This is counter to the allocation domain names via the registrar in spec 9. The BC and INTA have the same concerns, that if the names that were earlier reserved are released after the sunrise period, the independent sunrise period should be held for those names. And those are similar with the Valideus and the IPC, that the unlimited reservation of names does raise concerns for brand owners where whose -- those names are subsequently released from reservation after the sunrise has concluded. And the IPC goes on to add that the timing of these releases did not follow a specific standard or unified reporting method, and it would -- made it difficult for trademark holders to follow and implement procedures to procure their rights in post-sunrise name release batches. And finally, jumping up to the FairWinds Partner comment, item number six, saying "See below for the relevant sub-comments."

So, all those seem to be related to 2.7.1.e.3.3, which I think we will obviously have to address on the next call. So, there's only a minute left, so I'm going to jump to any -- sorry, Anne, I see you have your hand raised. Apologies. Go ahead.

Anne Aikman-Scalese: Yes, thank you. It's Anne for the transcript. I think that those -- the WG response for the concerns that were expressed about no sunrise period currently in place under the existing guidelines, those should probably all be labeled as concerns, and they're all -- they're five -- but the same concerns. And I know that we are -- it's about getting down to 2.7.1.e.3.3, but, in effect, they are all concerns. So, I think it would be more accurate, in terms of response, to label the WG response as concerns. Thank you.

Christa Taylor: Thanks, Anne. I'll make sure that happens. Any other comments? I know I'm right at the top of the hour, so I'm going to quickly jump to Any Other Business to see if anyone has any items. Anne, is that an old hand?

Anne Aikman-Scalese: Yes, sorry. I'll get that down. Thanks.

Christa Taylor: No problem. Thanks, Anne. Thank you all for all that. I know it was a bit of a difficult section to go through, but I think we made some pretty good progress. And I think we have the same thing, same time next week for our next call, and we'll pick up on line 93, which is section e.3.1.

So, thank you, everyone, for their time, and we will see you back next week.

Unidentified Participant: Thank you, Christa, and thanks, everyone, for joining. Today's meeting's adjourned. You can disconnect your lines, and have a good rest of the day.