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Republic of Cyprus positions on: a). Draft Applicant Guidebook V.3 for gTLDs b). Proposed Final Implementation Plan for IDN ccTLD Fast Track process

Dear Sirs,

With reference to the two abovementioned draft documents, that have been circulated by ICANN for comments and that will be discussed at the forthcoming ICANN meeting at Seoul, Republic of Korea, please consider the following positions of the Republic of Cyprus.

Draft Paper entitled "Draft Applicant Guidebook V.3 for gTLDs - Position of Cyprus

1. The rules governing the new gLTDs registration (paragraph 2.1.1.4.), as regards applications for domain names based on Geographical Names, should not be approved unless the applicant presents ICANN with a relevant authorization letter from the responsible body of the "affected" country where the geographical name belongs, which has to be a member of the UN and the relevant international organizations.

   The domain (geographical names) registration/delegation rules are not thorough enough. This might lead to misinterpretations and therefore the position of the Republic of Cyprus on this issue is consistent with the views shared by all other GAC representatives. More specifically, in our case we would like to stress that no domain names related to geographical locations belonging to the

Republic of Cyprus for this matter should ever be allowed to be delegated to or registered by any interested party, unless there is consensus/approval/letter of authorization from the Republic of Cyprus. This category of domain names should not be made available without the written consent of the Republic of Cyprus for no reason whatsoever, even if the Republic of Cyprus does not wish to apply to ICANN for these Geographical names.

2. Paragraph 2.3.5- "Communication Channels" in the 3rd draft applicant guidebook regarding gTLDs includes a short list of geographically related domain names that are reserved for use by specific countries such as "Mount Athos" reserved for Greece and "The Bolivian Republic of Venezuela" reserved for Venezuela.

   In similar fashion the Republic of Cyprus would like to address this issue so that the procedure followed by ICANN and the application examination/evaluation criteria in order to delegate/register a gTLD, should ensure that gTLDs of political importance and national sensitivity are also excluded from delegation to interested parties without the consent of the country that it refers to. Certain names of political sensitivity for the Republic of Cyprus might be proposed as domain names, following possible attempts by the secessionist entity in the occupied areas of the Republic to take advantage of any gaps in the rules of ICANN.

3. As regards protecting domains refering to "famous names and trademarks", our position is aligned with the ICANN introductive statements that the issue of "protection of famous names and trademarks" needs to be addressed in more detail and a final decision needs to be taken within the following months.

   For example, the document should include provisions that safeguard/ensure the fair registration/delegation of famous names (persons, products, trademarks, etc.) such as ".champagne" or, in the case of Cyprus, ".χαλούμι" (.haloumi) etc.

4. All applicants wishing to register a new gTLD which represents the name of a specific country or territory within a country member of the UN, should be asked to produce a letter of authorization/consent from the aforementioned country and its legal authorities.

Draft Paper entitled "Proposed Final Implementation Plan for IDN ccTLD Fast track Process"- Position of the Republic of Cyprus / General Comments

1. Upon receipt by ICANN of an application for the registration of an IDN ccTLD, ICANN should contact the respective country in order to check the validity of the application.

2. Limitations regarding the number of applications for the registration/delegation of new IDN ccTLDs (for example countries might wish to apply for an IDN ccTLD name to be registered using characters from the alphabets of all the country's/territory's official languages) that ICANN receives from the same country, should not be applied. In case that a country decides that it wants to register more than one IDN ccTLD, it should be entitled to proceed with multiple applications.

3. All domain names that relate to or refer to a specific country should be reserved on behalf of that country.

4. All IDN ccTLD names should state a meaningful representation of the country's name.

5. Applications from countries that wish to register an IDN ccTLD name using characters from an alphabet that does not represent one of their official languages, should also be accepted.

6. A list containing ccTLD names that are closely matched and might lead to confusion and misinterpretation should be drafted and notified to all countries in order to avoid confusion.

7. Applications for the same IDN ccTLD name should be treated on a fair basis although we feel strongly that priority for the ccTLD name registration should be given to countries that display a far greater degree of readiness in their technical and procedural preparations for "hosting" the requested ccTLD name.

8. Regarding the procedure for IDN ccTLD names application/registration our position is that the workflow actions should abide by the existing guidelines/rules as found in the document entitled "Principles and Guidelines for the Delegation and Administration of Country Code Top Level Domains", that currently apply for the registration of ccTLD names..

9. On the discussion on contractual agreements between the ccTLD name administrator and ICANN we wholly support ICANN's position that communication between the two parties should be transparent. We would like to note that existing practice related to ccTLD names administration should be taken into consideration before drafting the final document.

General Comments

As a general statement, we would like to highlight all the potential "dangers" that a notion such as making "gLTD or IDN ccTLD names" of highly "sensitive political nature" available to all interested parties irrespective of governmental or commercial/private patronage, might have for governments worldwide.

In order to avoid such problems of "political nature" ICANN should consider, upon receiving an application (for a gTLD or a ccTLD name) to bring the matter to the attention of the affected/relevant country and its lawfully responsible authorities.

In support of the above comments, please find below an indicative **but not exhaustive** list of gTLD names that the Republic of Cyprus considers of being of "highly sensitive political nature". We would like to bring to the attention of ICANN that granting the administration of these gTLTD names to other applicant besides the official representative of the Republic of Cyprus will have an adverse impact.

Indicative List of gTLD names

".κυπριακήδημοκρατία",
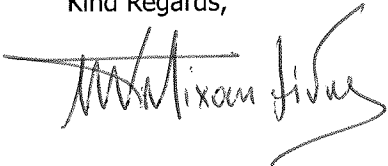".republicofcyprus",

".kypriakidimokratia",
".kıbrıscumhuriyeti",
".kibriscumhuriyeti",
".κυπριακό",
".karpasia",
".χαλούμι",
".haloumi",
".koumandaria",
".cyprus",
".kypros",
".κὺπρος"
".kıbrıs"
".kibris"
".κίμπρις"
".κίπρις"
".κιπρις"

etc.

GTLD names included in the above list should not be made available to any other than the Government of the Republic of Cyprus, even if the Republic does not apply for the use of these domain names, as we strongly believe that they should be treated as national resources.

We remain at your disposal for any clarifications that you might need on our comments/positions.

Kind Regards,

Dr Polys Michaelides
Commissioner of Electronic
Communications and Postal Regulation