# Registry Services Evaluation Policy (RSEP) Request

July 24, 2023

**Registry Operator**
ShortDot SA

**Request Details**
Case Number: 01191764

This Registry Services Evaluation Policy (RSEP) request form should be submitted for review by ICANN org when a registry operator is adding, modifying, or removing a Registry Service for a TLD or group of TLDs.

The RSEP Process webpage provides additional information about the process and lists RSEP requests that have been reviewed and/or approved by ICANN org. If you are proposing a service that was previously approved, we encourage you to respond similarly to the most recently approved request(s) to facilitate ICANN org's review.

Certain known Registry Services are identified in the Naming Services portal (NSp) case type list under "RSEP Fast Track" (example: "RSEP Fast Track – BTAPPA"). If you would like to submit a request for one of these services, please exit this case and select the specific Fast Track case type. Unless the service is identified under RSEP Fast Track, all other RSEP requests should be submitted through this form.

# 1. PROPOSED SERVICE DESCRIPTION

**1.1. Name of proposed service.**

NameBlock

**1.2. Provide a general description of the proposed service including the impact to external users and how it will be offered.**

ShortDot would like to offer NameBlock as a service to block second level domains for the top-level domains offered by the ShortDot. NameBlock offers an exact match or variant block options.

Blocking provides additional protection to the end user to prevent their brand and variations of their brand from being used for abusive purposes., to intellectual property holders by allowing them to block second-level labels that are related to the holders' registered trademarks. NameBlock will be offered as a service to accredited registrars or resellers who will be able to offer this service to users and registrants.  The blocked names must comply with the provisions described in Specification 5, Section 3.3 of the Registry Agreement.

We currently have ShortBlock, a similar but different service. ShortBlock will continue to be active until the existing users stop renewing their blocks under ShortBlock.  We will only be removing ShortBlock (via RSEP) once all existing clients choose not to renew their existing blocks.

NameBlock is notably different than ShortBlock mainly because of the different data it is using to block domains. NameBlock is a vendor that we are contracting with that is incorporating abuse data from IQGlobal, which pulls in abuse multiple abuse feeds and has different block levels than ShortBlock currently has.

NameBlock will be using TMCH verification for one of their blocking levels.

"In answer to question 5.1 of the RSEP request form, you mention that, "Domain Names blocked by the NameBlock service may be; exact match of a label, misspellings, or other variants relating to the applied for label…" When you say "variant labels", do you mean IDN variants as per the approved IDN tables?"
>> The variant block is more about abuse variants, i.e. commonly used terms in DNS Abuse added to a brand's name such as; microsoft-login, wellsfargo-forgotpassword, etc. This product from NameBlock is called AbuseShield and is pulling in the most commonly used terms for DNS Abuse. The AbuseShield product does not block the actual domain name, only the variants. NameBlock does have plans to block IDNs, as supported by our extesnions, that will contain letters/variants that are confusingly similar to ASCII letters.

The NameBlock service will be offered to registrars via NameBlock. As the RO we are not interacting directly with the Registrar. NameBlock has their verification policies in place. The AbuseShield Block does not require verification, and the ExactMatch block allows a trademark to fast track you on the verification process.

NameBlock will not interact with the existing ShortBlock service. We will let our existing users of ShortBlock know that we are also offering NameBlock and that they can continue using ShortBlock or can choose to not renew their ShortBlock block and buy a new block from NameBlock.

Would approval from the NameBlock holder be required for a third party with the same trademark to register the blocked name?
>>NameBlock only allows one block per term, so if there is already a block on any given string it cannot be blocked by someone else.


-All blocks are implemented in the Shared Registry System (SRS) as per the Registry Agreement and hence are subject to all relevant technical requirements, including escrow.
-The NameBlock service does not allow multiple blocks on the same label.
-The NameBlock service will not accept a block request for labels that match a domain name that is already registered, nor monitor registered domains to apply a block at a future, possible domain expiration date.
-The NameBlock service has a policy to handle disputes over blocked labels that may be requested by a third party.

As part of AbuseShield, NameBlock monitors names for future blocks, but does not block a name until it has been deleted.. If/when a name becomes unregistered after the normal life cycle of the deleted name (all the grace periods), the block will automatically take place, as long as the block is still active within the NameBlock system.

If a variant name of an existing block becomes unregistered (is not renewed and deletes) after the normal life cycle of that extension (all the grace periods), the block of that variant would automatically become active, as long as the block is still active. Once the block expires, any blocked names are unblocked and available for registration. .

The domain would not be eligible for drop-catching action to take place. NameBlock, on behalf of the Registry, warehouses the name in question, once it deletes from the zone, moves to the reserved list. Once that happens, Nameblock can apply the block.
This is how the other protected marks/blocking services do it as well


## 1.3. Provide a technical description of the proposed service.

NameBlock is a subscription service that allows Users to block domains within the TLD(s). NameBlock will allow accredited registrars and other resellers to submit orders to block a second-level string on behalf of a User.

When an order is received, exact match and/or variant labels of a users label are blocked from registration for the TLD's. Blocks may be offered from 1 - 10 year terms and have no outward impact on DNS resolution, zone files, or any other critical registry services.

Each blocked term may only be blocked by one user.

If a domain name is already registered, no block will be applied, and the domain will remain registered. However, if the domain name is not renewed and becomes available, then the block will be applied, and the label will not be made available.

**1.4. If this proposed service has already been approved by ICANN org, identify and provide a link to the RSEP request for the same service that was most recently approved.**

Similar requests have been submitted and approved for other registries; .club, .XXX (ICM Registry), Donuts, among others.

https://www.icann.org/en/system/files/files/rsep-2021023-archi-et-al-request-24aug21-en.pdf
https://www.icann.org/en/system/files/files/rsep-2021022-global-request-24aug21-en.pdf
https://www.icann.org/en/system/files/files/rsep-2021008-broker-et-al-request-20jul21-en.pdf
https://www.icann.org/en/system/files/files/rsep-2021003-bond-request-25may21-en.pdf
https://www.icann.org/en/system/files/files/rsep-2019077-club-request-25feb19-en.pdf
https://www.icann.org/en/system/files/files/rsep-2019086-xxx-et-al-request-30apr19-en.pdf
https://www.icann.org/en/system/files/files/rsep-2018058-donuts-request-13jun18-en.pdf

**1.5. Describe the benefits of the proposed service and who would benefit from the proposed service.**

Adding NameBlock as a service will be beneficial to NameBlock Users, as it will enable NameBlock Users to block labels across multiple ShortDot extensions, thereby preventing third parties from registering such labels.

Further, being able to block potential variants that could be used for abuse will reduce the number of domain names available that could be used for abusive purposes. Essentially NameBlock prevents DNS Abuse.

**1.6. Describe the timeline for implementation of the proposed service.**

ShortDot is ready to launch this service upon ICANN approval.

**1.7. If additional information should be considered with the description of the proposed service, attach one or more file(s) below.**

nameblock rsep pdf answerspdf

**1.8. If the proposed service adds or modifies Internationalized Domain Name (IDN) languages or scripts that have already been approved in another RSEP request or are considered pre-approved by ICANN org, provide (a) a reference to the RSEP request, TLD(s), and IDN table(s) that were already approved or (b) a link to the pre-approved Reference Label Generation Rules (LGR). Otherwise, indicate "not applicable."**

n/a

# 2. SECURITY AND STABILITY

**2.1. What effect, if any, will the proposed service have on the life cycle of domain names?**

The service will not affect the life cycle of domain names.

**2.2. Does the proposed service alter the storage and input of Registry Data?**

No, the service does not alter the storage and input of Registry Data.

**2.3. Explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems.**

The service will not affect the response time, consistency, or coherence of responses to the Internet servers or end systems.

**2.4. Have technical concerns been raised about the proposed service? If so, identify the concerns and describe how you intend to address those concerns.**

No technical concerns have been raised.

**2.5. Describe the quality assurance plan and/or testing of the proposed service prior to deployment.**

ShortDot and CentralNic have placed names on a block list for other reasons, including the ICANN Specification 5 list of blocked names. ShortDot will utilize a similar process, so the labels being blocked, once verified, will not be in the zone.

**2.6. Identify and list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.**

n/a

# 3. COMPETITION

**3.1. Do you believe the proposed service would have any positive or negative effects on competition? If so, please explain.**

The service will fairly compete with other programs already in place in other new gTLD registries that provide name-blocking services to trademark holders, such as Donuts, and .Club.

**3.2. How would you define the markets in which the proposed service would compete?**

There are many other registries offering similar services for their TLDs in the registrar market.

**3.3. What companies/entities provide services or products that are similar in substance or effect to the proposed service?**

Other Registry Operators such as Donuts, Inc., GoDaddy, and .Club Domains, LLC, offer similar products.

**3.4. In view of your status as a Registry Operator, would the introduction of the proposed service potentially affect the ability of other companies/entities that provide similar products or services to compete?**

No

**3.5. Do you propose to work with a vendor or contractor to provide the proposed service? If so, what is the name of the vendor/contractor and describe the nature of the services the vendor/contractor would provide.**

We will be working with NameBlock AS who will market, sell and manage the blocking of domain names with a technical connection to our technical backend service provider.

**3.6. Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed service? If so, please describe the communications.**

We have consulted with Registrars who offer trademark services  as well as Registrars who service the general public and have received positive feedback about NameBlock and the service it provides.

**3.7. If you have any documents that address the possible effects on competition of the proposed service, attach them below. ICANN will keep the documents confidential.**

# 4. CONTRACTUAL PROVISIONS

**4.1. List the relevant contractual provisions impacted by the proposed service. This includes, but is not limited to, Consensus Policies, previously approved amendments or services, Reserved Names, and Rights Protection Mechanisms.**

We propose an amendment to Exhibit A of TLD's RA to add the Proposed Services as an approved service.

**4.2. What effect, if any, will the proposed service have on the reporting of data to ICANN?**

n/a

**4.3. What effect, if any, will the proposed service have on Registration Data Directory Service (RDDS)?***

n/a

**4.4. What effect, if any, will the proposed service have on the price of a domain name registration?**

n/a

**4.5. Will the proposed service result in a change to a Material Subcontracting Arrangement (MSA) as defined by the Registry Agreement? If so, identify and describe the change. Please note that a change to an MSA requires consent from ICANN org**

**through the MSA change request process. The RSEP request must be approved prior to submitting the MSA change request.**

n/a

# 5. AUTHORIZATION LANGUAGE

**5.1. A Registry Agreement (RA) amendment is required when the proposed service: (i) contradicts existing provisions in the RA or (ii) is not contemplated in the RA and, therefore, needs to be added to Exhibit A of the RA and/or as an appropriate addendum/appendix. If applicable, provide draft language (or a link to previously approved RA amendment language) describing the service to be used in an RA amendment if the proposed service is approved. If an RA amendment is not applicable, respond with "N/A" and provide a complete response to question 5.2.***

**For examples or for IDN services, you may refer to the webpage for standard RA template amendments for commonly requested Registry Services.**

Protected Marks – NameBlock
NameBlock is a service that allows users to block certain labels from registration. The blocked names must comply with the provisions described in Specification 5, Section 3.3 of the Registry Agreement. Domain Names blocked by the NameBlock service may be; exact match of a label, misspellings, or other variants relating to the applied for label. Labels which are blocked as a result of participation in NameBlock do not prevent other users or NameBlock holders from unblocking a domain name associated with the blocked label and registering the domain name.

**5.2. If the proposed service is permissible under an existing provision in the Registry Agreement, identify the provision and provide rationale. If not applicable, respond with "N/A" and provide a complete response to question 5.1.**

Each of our extensions have previously received ICANN approval of an RSEP on the ShortBlock service. ShortBlock is similar operationally to NameBlock; however, NameBlock offers a wider range of blocking variants and is better suited to prevent DNS Abuse. ShortDot will be maintaining the ShortBlock service; however, any new blocks will be processed via NameBlock.

# 6. CONSULTATION

**6.1. ICANN org encourages you to set up a consultation call through your Engagement Manager prior to submitting this RSEP request. This is to help ensure that necessary information is assembled ahead of time.**

**Identify if and when you had a consultation call with ICANN org. If you did not request a consultation call, provide rationale.**

The NameBlock service provider has had several discussions with ICANN Org about the NameBlock service.

**6.2. Describe your consultations with the community, experts, and/or others. This can include, but is not limited to, the relevant community for a sponsored or community TLD, registrars or the registrar constituency, end users and/or registrants, or other constituency groups. What were the quantity, nature, and results of the consultations? How will the proposed service impact these groups? Which groups support or oppose this proposed service?**

NameBlock service provider has had discussions with several registrars, both those serving the trademark community and those serving the general public, by email and by phone. The purpose of those discussions was to determine potential demand as well as the best method for NameBlock to function, and if there were any likely unintended consequences.

# 7. OTHER

**7.1. Would there be any intellectual property impact or considerations raised by the proposed service?**

No

**7.2. Does the proposed service contain intellectual property exclusive to your gTLD registry?**

No

**7.3. Provide any other relevant information to include with the request. If none, respond with "N/A."**

n/a

**7.4. If additional information should be considered, attach one or more file(s) below.**

**Affected TLDs**

| Current Registry Operator | Top Level Domain | Registry Agreement Date |
|---|---|---|
| ShortDot SA | .bond | 2014-06-05 |
| ShortDot SA | .cfd | 2014-12-11 |
| ShortDot SA | .cyou | 2015-01-22 |
| ShortDot SA | .icu | 2015-01-08 |
| ShortDot SA | .sbs | 2014-11-07 |