

1 August 2019

Mr. LiGuo Zhou  
Legal Counsel, Intellectual Property Department  
Tencent Group

Re: Your Letter of 8 July 2019

Dear Mr. LiGuo Zhou,

Thank you for your [letter](#) dated 8 July 2019 regarding how singular and plural top-level domains (TLDs) were dealt with in the 2012 round of new generic top-level domains (gTLDs).

As you likely know, the implementation of the 2012 new gTLD program was conducted in accordance with the Generic Names Supporting Organization (GNSO) policy as well as the gTLD Applicant Guidebook, developed in consultation with the community and approved by the ICANN Board. In accordance with the gTLD Applicant Guidebook, the string similarity evaluation was performed by independent third-party experts using criteria defined in the Guidebook.

As part of ICANN's mandate to ensure that issues of competition, consumer protection, security, stability and resiliency, malicious abuse, sovereignty concerns, and rights protection are considered in the introduction of new gTLDs, the ICANN Bylaws call for a Competition, Consumer Trust, and Consumer Choice Review of the 2012 program. The Competition, Consumer Trust, and Consumer Choice (CCT) Review Team recently produced a [Final Report](#) that examines the extent to which the introduction of new gTLDs has promoted competition, consumer trust, and consumer choice in the domain name system. Its work was informed by multiple studies, research, and data gathering initiatives, as well as input from the ICANN community and ICANN Board.

In the report, Recommendation 35 addresses the importance of string similarity, stating that, "The Subsequent Procedures PDP should consider adopting new policies to avoid the potential for inconsistent results in string confusion objections." The review team proposed three possibilities regarding string similarity that the Subsequent Procedures PDP should consider. These include: 1) Determining through the initial string similarity review process that singular and plural versions of the same gTLD string should not be delegated; 2) Avoiding disparities in similar disputes by ensuring that all similar cases of plural versus singular strings are examined by the same expert panelist; 3) Introducing a post-dispute resolution panel review mechanism. For further insight into their preliminary findings and deliberations, you may consult the full report.

String similarity is a topic of discussion within the Subsequent Procedures PDP Working Group. Section 2.7.4 of its [Initial Report](#) contains a summary of the discussion as well as preliminary recommendations from the PDP Working Group. You may like to review the report and participate in the Subsequent Procedures PDP Working Group discussions to share your views.

Thank you again for taking the time to write to us and for your continued participation and engagement in the ICANN new gTLD program.

Sincerely,



Cyrus K. Namazi  
Senior Vice President  
Global Domains Division