

Patrick Jones

From: Stephan Welzel/Denic [welzel@denic.de]
Sent: Friday, October 06, 2006 3:58 AM
To: patrick.jones@icann.org
Subject: .name and ISO 3166-1 codes

Dear Patrick,

As you probably know, Chris Disspain has invited ccTLD registries to comment on GNR's request to open registration of ISO 3166-1 country codes under .name. Therefore, I attach below the comment I sent to the cctld-discuss list the other day.

I should like to emphasize that DENIC, while not terribly interested in the political implications (i. e. the GAC's reservations), is indeed concerned about the technical side of the issue (i. e. the problem described in RFC 1535).

With best regards,
Stephan Welzel
General Counsel
DENIC (.de)

All,

We received that request from GNR too and told them that we don't like their idea, already for technical reasons. That is because domain names following the model TLD.TLD (like de.name) cause technical problems, as described in RFC 1535. For some other reason, btw, we did some checks on this the other day and found that these problems do still occur.

Furthermore, we told GNR that the reservation of ISO 3166-1 codes under gTLDs mostly goes back to a request from the GAC (cf. <http://gac.icann.org/web/communiques/gac5com.htm>) so that they should not (only) ask the ccTLDs, but also the GAC ;) It's interesting how GNR themselves refer to (and even quote) Appendix K of their registry agreement which explicitly states: "The reservation of a two-character label string shall be released to the extent that the Registry Operator reaches agreement with the government and country-code manager" - yet they

act as if only the ccTLD managers' consent counted.

Best,
Stephan