



ICANN Registry Request Service

Ticket ID: T4L6S-8S2M8

Registry Name: Global Name Registry, LTD

gTLD: .name

Status: ICANN Review

Status Date: 2006-10-02 11:12:12

Print Date: 2006-10-02 11:54:43

Proposed Service

Name of Proposed Service:

Limited Release of Initially Reserved Two-Character Names

Technical description of Proposed Service:

In pure technical terms, Global Name Registry proposes to simply add and reserve for third level registrations, all two-character strings according to the current rules in the .NAME registry. The strings will be added to the already existing shared third-level namespace on the .name gTLD available to people worldwide through ICANN Accredited Registrars, and made available for registration on the third level on a first-come, first-served basis. All two-character names will be shared and not released directly on the second level.

This is a simple extension of the available namespace, anticipated by Appendix K. As such, it does not fit the term "Service", we have rather designated it in the following as "Limited Release of Two-Character Names"

By way of background, since the inception of .name Global Name Registry has, per its Appendix K, initially reserved all two-character strings at the second level, such as xi.name, li.name, or ng.name.

Many of these two-character strings are common names, most notably in certain Asian countries where millions of people have two-character names, such as 'Li', when transcribed to the domain name character set. As .name has grown in size and outreach, it is apparent that the discrimination of two-character last names is blocking people from getting their own personal name as a .name address.

Technically, and in reference to the language of Appendix K, the proposed release is not a release of the two-character strings on the second level. Rather, the proposal is to share all such two-character names for third level registrations only.

Shared second levels is not new, there are today thousands of names that are reserved for third level registration only, such as smith.name or jones.name, where the second level is shared between people with the same name. Third level registrations on such shared second levels are of the type john@smith.name or jim.jones.name.

A common comment to any given string is that "this cannot possibly be a person's name". The two-character strings are no exception and in reaching out to ccTLDs, we have been confronted with this argument. In fact, to the best of our knowledge and extensive research there is no global database (except .name itself) on names in the world - the information might exist in the world's various telephone directories, birth registers, voter registers, citizen tables, etc, but it is impossible to say on a



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general basis what does and what does not constitute a name. While the obvious candidates for common two-character lastnames are the most common (transcribed) Chinese names and held by millions (like li, ly, lu, wu, ng, tu, ma, ho, hu, he, ko, go, lo, la, ta, co, yu, vu, iu, du, da, su, so, eu, ip, do, to, ki, fu, te, im, ha, ga, ka, mo, ku, gu, si, ke, fo, ge), there is no reason to believe that other two-character names, seemingly less probable to a casual observer of names, do not exist.

Appendix K describes these two-character strings as initially reserved on the second level. Appendix K further provides that if The Registry Operator reaches agreement with the government and country-code manager, or the ISO 3166 maintenance agency the reservation shall be released. Appendix K further provides for release of two-character strings if the Registry Operator implements measures to avoid confusion with corresponding country codes.

The .name TLD has been operational since 2002 and has been steadily growing in size and outreach worldwide. Therefore, we feel that the time for initial reservation is past.

Because Global Name Registry is not proposing to release the second level names to Registrants, but only for the purpose of providing to Registrants a third level addresses on a given second level. As a result, the language in Appendix K might not apply to this particular proposed release.

Not drawing any conclusion on the foregoing as to the applicability of Appendix K, Global Name Registry now proposes to release the initial reservation on two-character strings based on the Registry's implementation of three measures to avoid confusion with the corresponding country codes, described in the following.

Measure 1: No release on the second level. Global Name Registry proposes that the two character codes will not be released on the second level, rather, they will only be "sidestepped" for the purpose of third level addresses. For example, the name Xi will only become available as a third level address when combined with a first name, e.g. Yin@Xi.name and/or Yin.Xi.name. In this model, the actual second level xi.name cannot be registered. Second level two-character domain names will not be available for registration. This sharing paradigm also ensures that the maximum amount of people can get an optimal email address on Xi.name, by fairly sharing it between different first names .

Because of this third level restriction policy for the two-character names, there can be no confusion between a country code like .xi , and the personal address yin@xi.name, which clearly is a personal name used as an email address.

Measure 2: Communication and process to achieve consent from ISO and as many ccTLD managers as possible. Consistent with Appendix K and as an additional measure to enhance collaboration and avoid confusion with the two-character strings and the corresponding country codes, Global Name Registry has reached out to all ccTLD managers and to the International Standards Organisation (ISO) and asked for consent to release the two-character strings for third level registrations. This outreach process is continuing and Global Name Registry aims to inform, get feedback and where possible, get the explicit consent from each ccTLD authority.



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With regard to the ISO, we have had an conversation with the Information Officer at the ISO. He pointed out that the ISO3166 list standardizes the two-character naming scheme for countries, and that several of the two-character strings on the 3166 list are "user assigned" in addition to the assigned codes. User assigned codes can be used for any country or regional identifier as chosen by the user in the user's database. The assigned codes, however, must be used as an identifier for the country to which it is assigned. However, because .name proposes to use the two-character strings for names, and not in any way to identify a country or region, the ISO Information Officer has made it clear that the ISO does not have an opinion and would not want to standardize the use of two-character names on .name.

A communication from the ISO is attached in the Consultation section.

We believe that these continuing outreach processes will contribute to minimize confusion about the .name proposed release of the two-character names.

Measure 3: Current and reinforced awareness that .name is a gTLD exclusively for personal names. .name is steadily increasing it's outreach and general awareness among the Internet community. There is thus the growing realisation that .name is a space for personal names. Because of the dedicated role of .name, it is already unlikely, and will be increasingly so in the future, that Internet users in general will have difficulty seeing the difference between yin@xi.name (a personal email address on .name) and www.something.xi (a website on the ".xi" country code ("xi" is currently a user-assigned code in the ISO 3166)).

To further enforce this differentiation of .name as a personal namespace, Global Name Registry proposes to publish, on the shared second level of each two-character name, during a transitory period of at least 12 months, a notice that the shared second level in question is unrelated to the corresponding country code and is being used as a shared last name for personal names on the third level.

Conclusion

Global Name Registry is cautious and respectful of any potential confusion with the country codes, and as a result of the significant measures taken to avoid and eliminate any confusion that could arise; most notably the measure that the two-characters are not actually proposed released, only reserved by the Registry for third level registrations - Global Name Registry believes that there is no risk of confusion between a country code, managed by a country, and a two-character name on .name, used and managed by individuals for the purpose of a personal email address like yin@xi.name, or (less commonly), as a domain name for a personal web address of the type yin.xi.name.

People have the names they have and we should strive to enable their use. Today, millions of people with two-character names are blocked from using them, and as the global namespace for individuals' names, we want to ensure that .name can



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adapt to the world and to the market. Releasing the initial reservation of two-character names is appropriate, carries no risk of confusion and will be beneficial to potentially millions of people as well as to the further growth of .name.

Global Name Registry therefore proposes to release the initial reservation of two-character names on .name in a limited fashion, within the constraints and safeguards described above, to the user community.

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

Consistent with Appendix K and as an additional measure to enhance collaboration and avoid confusion with the two-character strings and the corresponding country codes, Global Name Registry has reached out to all ccTLD managers (as per the IANA web site) via email, and to the International Standards Organisation (ISO) and asked for consent to release the two-character strings for third level registrations, while explaining the reason and the measures taken to eliminate any possible confusion between the two-character names and the ccTLD string.

Getting feedback on this issue from ccTLDs is inherently asking for negative feedback, since no incentive, monetary or otherwise, can be given in return for the ccTLDs consent. Consent, where given, is given kindly and charitably. Therefore, we expected exclusively negative replies. However, about half of responses were positive to our request.

A representative sample of this communication is included as a PDF to this document. Because it was not initiated as a public discussion, we consider this communication private and confidential and not for public disclosure and for ICANN's review only.

Further also to Appendix K, Global Name Registry has informed, dialogued and sought consent from the ISO (International Standards Organization) to release the two-character names on .name, and have had several conversations and email correspondence with Joseph Martinez (Information Officer) at the ISO. Mr Martinez pointed out that the ISO3166 list standardizes the two-character naming scheme for countries, and that several of the two-character strings on the 3166 list are "user assigned" in addition to the assigned codes. User assigned codes can be used for any country or regional identifier as chosen by the user in the user's database. The assigned codes, however, must be used as an identifier for the country to which it is assigned. However, because .name proposes to use the two-character strings for names, and not in any way to identify a country or region, Mr Martinez has made it clear that the ISO does not have an opinion and would not want to standardize the use of two-character names on .name. The issue was discussed at the ISO 3166 Maintenance Agency member meeting on Sept 4 and Sept 5 and concluded that the ISO has no opinion on the issue of .name using two-character



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strings for the purpose of .name email addresses and domains for personal names.

A PDF copy of our correspondence with Mr Martinez is enclosed. Because it was not initiated and intended as a public discussion, we consider this communication private and confidential and not for public disclosure and for ICANN's review only.

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

n.a.

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

Consultation with other entities than ccTLD managers and the ISO was not anticipated by Appendix K and we believe such are not required.

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Consultation with other entities than ccTLD managers and the ISO was not anticipated by Appendix K and we believe such are not required.

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Consultation with other entities than ccTLD managers and the ISO was not anticipated by Appendix K and we believe such are not required.

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

Any person with a two-character name, today blocked from registration, would likely endorse this service. Also, any



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consumer service, considering to offer .name to its users as personal email addresses or URLs, with users having two-character names, is likely to endorse this service.

We already have received requests from at least one very significant Asian portal to get the two-character names released before they can offer .name to their userbases.

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

We expect a minority of ccTLD managers to object to the introduction of this service on principal grounds. We do not think that such objection can reasonably be based on risk of confusion between the two-character name (of the type yin@xi.name) and the ccTLD (www.example.xi).

Timeline

Please describe the timeline for implementation of the proposed new registry service:

The Limited Release of two-character names would happen as soon as possible to support the potential mass market partners that would like to offer .name to their customers. Competition in the email, portal and digital lifestyle aggregator market is fierce and rapid and .name would be wise to not miss the opportunity to work with mass market user portals.

Business Description

Describe how the Proposed Service will be offered:

Global Name Registry proposes that the two character codes will not be released on the second level, rather, they will only be "sidestepped" for the purpose of third level addresses. For example, the name Xi will only become available as a third level address when combined with a first name, e.g. Yin@Xi.name and/or Yin.Xi.name. In this model, the actual second level xi.name cannot be registered. Second level two-character domain names will not be available for registration. This sharing paradigm also ensures that the maximum amount of people can get an optimal email address on Xi.name, by fairly sharing it between different first names .

.name is steadily increasing it's outreach and general awareness among the Internet community. There is thus the growingrealisation that .name is a space for personal names. Because of the dedicated role of .name, it is already unlikely, and will be increasingly so in the future, that Internet users in general will have difficulty seeing the difference between



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yin@xi.name (a personal email address on .name) and www.something.xi (a website on the ".xi" country code).

To further enforce this differentiation of .name as a personal namespace, Global Name Registry proposes to publish, on the shared second level, during a transitory period of at least 12 months, a notice that the shared second level in question is unrelated to the corresponding country code and is being used as a shared last name for personal names on the third level.

Describe quality assurance plan or testing of Proposed Service:

The two-character names themselves will be operating exactly like Shared Second Level Domains do today (e.g. smith.name, jones.name, olsen.name)

The quality assurance procedures for the reservation of two-character second level names, and the process of making these available for third level domain name, email forwarding and dual registrations, will include the following main steps:

Staging environment overview procedures:

- 1. Automated checks of two-character third level reservation list to ensure completeness. A software package will be developed in house to ensure the completeness of the two-character reservation list.*
- 2. Manual verification of possible exceptions to the two-character reservation list.*
- 3. EPP command verification of reserved two-character second-level domains.*
- 4. EPP command verification for third-level domains on reserved two-character second level domains.*
- 5. EPP command verification for third-level email forwarding on reserved two-character second level domains.*
- 6. EPP toolkit interoperability test of reserved two-character second-level domains.*
- 7. EPP toolkit interoperability test for third-level domains on reserved two-character second level domains.*
- 8. EPP toolkit interoperability test for third level email forwarding on reserved two-character second level domains.*
- 9. WHOIS system validation verification of reserved two-character second-level domains.*
- 10. WHOIS system validation verification for third-level domains on reserved two-character second level domains.*
- 11. WHOIS system validation verification for email forwarding on reserved two-character second level domains.*
- 12. Perform Email Forwarding system (MX) validation for email forwarding on reserved two-character second level domains.*
- 13. Perform DNS resolution validation for third-level domains on reserved two-character second level domains.*
- 14. Perform DNS resolution validation for MX records for two character second level domains used for third level email forwarding registrations.*
- 15. Perform verification registrations (end-to-end), modifications, updates and deletes on a selection of third-level domains on a random selection of the reserved two-character domains.*

Production system overview procedures:



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1. Perform real-world delivery verification for a selection of 3rd level email forwarding registrations on a random sample of two character second levels.
2. Perform real world resolution verification of third level domain registration on two character domain names.
3. Perform periodically scrubbing to ensure validity of ongoing registration of third-level email forwarding registrations on two character reserved second level domain names.
4. Perform periodically scrubbing to ensure validity of ongoing registration of third-level email forwarding registrations on two character reserved second level domain names.

After initial launch a custom management report will be produced for the applicable registration and further validation will be performed based on this data.

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

n.a.

Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

The Limited Release of the two-character names will only possibly affect Appendix K, where the paragraph on reservation of two-character strings might be taken out. However, there are two existing procedures for releasing the two-character strings in Appendix K and so no changes might be required.

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

The Limited Release of the two-character names will not impact on ICANN reporting

What effect, if any, will the Proposed Service have on the Whois?:

The Limited Release of the two-character names will show in Whois in the same way as Shared Second Levels show today, e.g. for smith.name



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Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

The Limited Release of the two-character names will only possibly affect Appendix K, where the paragraph on reservation of two-character strings might be taken out.

However, there are two existing procedures for releasing the two-character strings in Appendix K and so changes might not be required.

Benefits of Service

Describe the benefits of the Proposed Service:

Since the inception of .name Global Name Registry has, per its Appendix K, initially reserved all two-character strings at the second level, such as xi.name, li.name, or ng.name.

Many of these initially reserved two-character strings are common names, most notably in certain Asian countries where millions of people have two-character names, such as 'Li', when transcribed to the domain name character set.

As .name has grown in size and outreach, it has become clear and apparent that the discrimination of two-character last names is blocking people from getting their own personal name as a .name address.

.name is the namespace for people's names, and it will be a key benefit to potentially millions of people (for some quantitative information, one resource can be found on http://en.wikipedia.org/wiki/List_of_common_Chinese_surnames) with names that transcribe to two-characters to have the .name two-character names released.

The .name audience is global and it is impossible to evaluate all benefits of giving people their own name. However, we believe the key benefits of the Limited Release of Two Character names are the following:

- 1. Allowing people with two-character Personal Names to finally get a personal, memorable and potentially lifelong address on .name, which as thus far been blocked for registrations.*
- 2. Enabling the large Asian mass market portals, through ICANN Accredited Registrars, to offer .name addresses to their users, without having 20-30% blocked by the two-character name reservation.*
- 3. Enhancing the competitiveness and growth potential of .name as a gTLD*



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Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

The Limited Release of the two-character names will enable the .name gTLD to provide names to people with two-character names who are today blocked from getting a .name address. This will have positive effects on the perception and penetration of .name in people's email and domain services world wide.

We believe the Limited Release of the two-character names will enhance competition by making .name an attractive alternative to other naming systems on the Internet, such as .com or localized address systems like @yahoo.co.jp.

How would you define the markets in which your proposed Registry Service would compete?:

First, .name as a gTLD in the mass market essentially competes with all already established email addresses and email services, of which there are thousands worldwide. It is a brutal and highly competitive market where every player fights for market share and against churn.

Second, .name is an address space for individuals and people's names and competes for attention and mindshare with other gTLDs, most importantly .com, as well as with any other mass market email address space.

Third, several ccTLDs have launched their own personal spaces, like me.co.uk (notably, also a two-character string), nom.fr or pers.no, with which .name in many senses competes.

Finally, .name competes with consumer products online that aim for consumers' mindshare and "wallet share". .name is not a "must have" item like a .com domain name is for businesses, and must work hard to earn people's emotional attachment and gain them as registrants worldwide.

It is in this context that it is important for .name to be available to the widest possible audience and a vital part of that is to have people's names available, including the two-character lastnames, which today are Initially Reserved and blocking people from legitimate and rightful use.

What companies/entities provide services or products that are similar in substance or effect to your proposed



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Registry Service?:

The .name gTLD address space is an intrinsic part of the Registry and the Limited Release of two-character names does not alter or change this principle, it simply adds two-character names to the already existing and much larger shared name namespace available to people worldwide.

In effect and in substance, any email company in the world provides addresses to their users, some even including custom domain names, like AOL, Yahoo and Hotmail/Live.com offering .com domain names with their existing email service.

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

The .name gTLD address space is an intrinsic part of the Registry and the Limited Release of two-character names does not alter or change this principle, it simply adds two-character names to the already existing and much larger shared name namespace available to people worldwide.

The Limited Release of two-character names will not impair, alter or change, either positively or negatively, this aspect.

Rather, it will affect the community positively by getting more utility and availability out of the .name gTLD.

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

The Limited Release of the two-character names does not require any additional vendors or contractors.

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

The Registry constantly strives to work with, and enable, mass market operators to work with ICANN Accredited Registrars to provide .name to their userbase and benefit from additional personalization. The request to open the two-character names has in fact originated from one or more of these conversations.



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We have communicated with the ccTLDs as described in the consultation section. Some ccTLDs might feel that they are affected by .name by way of its effect on giving consumers a choice of TLD for their personal registrations.

We have communicated with the ISO as per Appendix K. The ISO has made it clear that it does not have an opinion on the release of the two-character names on .name.

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

n.a.

Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

The Limited Release of two-character names does not alter storage and input of Registry date. It simply will allow two-character strings to be used on the second level of third level registrations, e.g. Yin@Li.name or yin.wu.name

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

The Limited Release of two-character names will not affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

We believe that there are no relevant technical concerns about the limited release of two-character names. However, for completeness, we would mention that RFC 1535 has been raised as a concern by the ccTLD manager DENIC.



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According to this, as far as we understand, (very) old versions of BIND that have been explicitly configured to enable this questionable "feature", will, when trying to connect from for example User@Machine.Tech.ACES.NAME to UnivHost.University.DE, try the following combinations until a resource record is found:

UnivHost.University.DE.Tech.ACES.NAME.

UnivHost.University.DE.ACES.NAME.

UnivHost.University.DE.NAME.

UnivHost.University.DE.

However, this is not a problem confined to two-characters, it applies to any string length or any top level domain, including .DE or .COM. Therefore, if the issue was relevant, the following would also be a problem:

UnivHost.University.NAME.Tech.ACES.DE.

UnivHost.University.NAME.ACES.DE.

UnivHost.University.NAME.DE.

UnivHost.University.NAME.

UnivHost.University.NAME.Tech.ACES.COM.

UnivHost.University.NAME.ACES.COM.

UnivHost.University.NAME.COM.

UnivHost.University.NAME.

The concern raised by DENIC did not mention how such old resolvers would deal with two-character subdomains on very large ccTLDs, like co.uk, co.jp, or co.kr, to mention a few.

Also note that two-character names are existing on .COM today and are posing no problem to technical stability and security. To our knowledge this has not been a relevant issue since much after the RFC was written in 1993.

As a result, we do not believe that RFC 1535, or this potential behaviour of (very) old versions of BIND is a concern, and even if it was, releasing two-character names on .name would only make .name consistent with e.g. .COM.

Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

The Limited Release of two-character personal names will result in release of registrations on the third level only, for personal, individual names as third level domain and email registrations.



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The intellectual property protection mechanisms that are available on .name today for third level registrations, specifically, NameWatch and Defensive Registrations, as well as the ERDRP dispute resolution process, will continue to be available and apply to third level registrations also on two-character shared names.

Existing and future Defensive Registrations and NameWatch registrations will be functional also on the namespace of the shared two-character names after its release.

As a result, we believe there are no concerns about intellectual property.

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No.

List Disclaimers provided to potential customers regarding the Proposed Service:

n.a.

Any other relevant information to include with this request:

As per Appendix K,



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1) A representative sample of the communication with the ccTLD managers; and

2) communication with the ISO are attached.