

Report of Public Comments

Title:	Introduction of Two-Character Domain Names for .SOHU, .IMMO, .SAARLAND, .CLUB																						
Publication Date:	10 November 2014																						
Prepared By:	ICANN Staff																						
Comment Period:		Important Information Links																					
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Section I: General Overview and Next Steps																							
General Overview																							
<p>ICANN received four (4) Registry Services Evaluation Policy (RSEP) requests from the four (4) Registry Operators noted below to allow for the introduction of two-character domain names in the New gTLD namespace.</p>																							
<table border="1"> <thead> <tr> <th>Proposal</th> <th>TLD</th> <th>Registry Name</th> <th>Documents</th> </tr> </thead> <tbody> <tr> <td>2014045</td> <td>club</td> <td>.Club Domains, LLC</td> <td>.Club Domains, LLC Request 6 August 2014</td> </tr> <tr> <td>2014042</td> <td>saarland</td> <td>dotSaarland GmbH</td> <td>dotSaarland GmbH Request 29 July 2014</td> </tr> <tr> <td>2014041</td> <td>immo</td> <td>Donuts, Inc., submitted by Binky Lake, LLC</td> <td>Binky Lake, LLC Request 22 July 2014</td> </tr> <tr> <td>2014036</td> <td>sohu</td> <td>Sohu.com Limited</td> <td>Sohu.com Limited Request 11 July 2014</td> </tr> </tbody> </table>				Proposal	TLD	Registry Name	Documents	2014045	club	.Club Domains, LLC	.Club Domains, LLC Request 6 August 2014	2014042	saarland	dotSaarland GmbH	dotSaarland GmbH Request 29 July 2014	2014041	immo	Donuts, Inc., submitted by Binky Lake, LLC	Binky Lake, LLC Request 22 July 2014	2014036	sohu	Sohu.com Limited	Sohu.com Limited Request 11 July 2014
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<p>These RSEP requests include a total of four (4) New gTLDs and were posted for public information on the RSEP webpage, available at https://www.icann.org/resources/pages/rsep-2014-02-19-en.</p>																							
<p>In accordance to Section 2.4 of the RSEP, ICANN conducted its preliminary determination and concluded that the proposed Registry Service did not raise significant Security or Stability or competition issues (as defined in Section 1.3 and 1.4 of the RSEP), with each of the respective RSEP requests above.</p>																							
<p>On 19 August 2014, ICANN posted each proposed Registry Agreement amendments for public comment as the implementation of the Registry Service requires a material change to each respective Exhibit A of the Registry Agreement.</p>																							

On 1 October 2014, the public comment forum closed for community input to the proposed Registry Agreement amendments, resulting in a total of three (3) comments. No commenters commented on specific requests of the registries, but rather, focused their comments on the general concept of whether or not two-character domain names should be released.

Next steps

Given the necessary consideration and balancing of the interests of all affected parties, including countries, registries, registrants, and end-users, and while being mindful of other public comment periods on this topic, ICANN carefully considered all the contributions it received as well as the work within the GAC who considered the matter at the ICANN 51 meeting in Los Angeles. Please refer to the [Los Angeles Communiqué](#) as well as the recent correspondence between the GAC and the ICANN Board on this topic:

- <https://www.icann.org/resources/correspondence/dryden-to-crocker-2014-08-08-en>
- <https://www.icann.org/resources/correspondence/crocker-to-dryden-2-2014-09-02-en>
- <https://www.icann.org/resources/correspondence/dryden-to-crocker-2014-09-10-en>

In the GAC's [Los Angeles Communiqué](#) (15 October 2014), the GAC noted it was "not in a position to offer consensus advice on the use of two-character second level domain names in new gTLD operations, including those combinations of letters that are also on the ISO 3166-1 alpha 2 list." The GAC also noted that, "[i]n considering these RSEP requests and consistent with the Applicant Guidebook, the GAC considers that the public comment period is an important transparency mechanism, and in addition asks that relevant governments be alerted by ICANN about these requests as they arise."

On 16 October 2014, the ICANN Board [resolved](#) that the proposed registry service for the release of two-character domains in the gTLD namespace does not create a reasonable risk of a meaningful adverse effect on security and stability, and the Board authorizes the President and CEO, or his designee(s), to develop and implement an efficient procedure for the release of two-character domains currently required to be reserved in the New gTLD Registry Agreement, taking into account the GAC's advice in the Los Angeles Communiqué.

Accordingly, ICANN is working to develop a mechanism to authorize those two-character RSEP requests that have completed the public comment period and implement an efficient approach to release future two-character domain names in accordance to the ICANN Board resolution.

Section II: Contributors

At the time this report was prepared, a total of three (3) community submissions had been posted to the Forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
At-Large Advisory Committee (ALAC)	ICANN At-Large Staff	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
Michele Neylon	Blacknight Solutions Hosting & Colocation, Domains	MN
Peter Cerny		PC

Section III: Summary of Comments

General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

Out of the three (3) comments received, two (2) of them support the release of two-character domain names in the new gTLD namespace, while one (1) of the comments received oppose the release of the two-character letter-letter domain names. None of the commenters raised concerns about number-number and number-letter two character domain names. In addition, no comments were received on specific requests of the registries, but rather, focused their comments on the general concept of whether or not two-character domain names should be released. Some of the comments raise general implementation concerns about introducing two-character domains in the new gTLD namespace, while others raise general concerns about the RSEP process and the handling of requests to release two-character domain names.

1) Regarding the proposed introduction of two-character domains in general

The arguments made in opposition to introducing letter-letter domain name combinations are the following:

“To protect ccTLD domain names, all two-letter domain names should stay blocked and reserved... As new countries pop-up year by year, not just existing country codes combinations, but all two-letter names should be prohibited to be registered.” (PC)

The arguments made in favor of introducing some or all two-character domains in the new gTLD Namespace are the following:

- “There are no technical reasons to block two-character domain names. While a large number of ccTLDs currently have policy restrictions with respect to 2 character (and 2 letter) domain names these restrictions are not universal. Many country codes do not impose any such restriction and, to the best of my knowledge, either never did or if they did they removed it at some point in their history.” (MN)

- “Absent any DNS-related security or stability issues, the ALAC believes that all the restrictions of two character ASCII labels at the 2nd level within a TLD should ultimately be removed, and has no problem with the current exceptions being approved.” (ALAC)

2) Implementation concerns and proposals

A few concerns were expressed with respect to implementation of the introduction of two-character domain names. Specifically, PC suggested that priority rights should be afforded to trademark owners to claim their matching name in a sunrise period, with no premium registration or renewal fees for these names.

Section IV: Analysis of Comments

General Disclaimer: This section is intended to provide an analysis and evaluation of the comments received along with explanations regarding the basis for any recommendations provided within the analysis.

Over the past six months, registry operators representing 207 new gTLDs have submitted requests pursuant to the Registry Services Evaluation Policy (RSEP) requesting the release of various combinations of two-character domain names, including: (a) number-number combinations; (b) letter-letter combinations not currently in use by a ccTLD, (c) all letter-letter combinations (regardless of whether the combination is in use by a ccTLD), and (d) letter-number combinations. Amendments to the applicable Registry Agreements to implement the requests have been the subject of public comment.

The comments received articulated arguments in favor of, or in opposition to, the release of certain two-character names in the new gTLD. No specific concerns were raised about number-number and number-letter two character domain names.

ICANN takes note of the comments to prohibit the release of two-character domain names that are letter-letter combinations to avoid confusion with country codes. As highlighted by several comments in favor of the release of two-character domain names, it should be noted that several legacy gTLDs were previously permitted to release, and successfully released, certain two-character domain names, including letter-letter combinations. In 2006, .name requested a limited release of reserved two-character names, which matter was referred to the Registry Services Technical Evaluation Panel (RSTEP). The RSTEP considered the security and stability impacts of the proposal, which focused on unexpected responses being received from the DNS for both existing and non-existing domains, as well as simply user confusion where the idea of two letter second-level domains is unfamiliar. Based on the report of the RSTEP, internal experts and other public comments, no significant security and stability issues related to introduction of the proposal were identified, and the Board adopted a resolution on 16 January 2007 to authorize ICANN to amend the .name Registry Agreement to implement the proposed registry service. From 2007 to 2012, ICANN approved various proposals regarding the release of two-character domain names for 11 gTLDs (.jobs, .coop, .mobi, .biz, .pro, .cat, .info, .travel, .tel, .asia, and .org).

During ICANN 51, following GAC's [Los Angeles Communiqué](#), the ICANN Board [resolved](#) on 16 October 2014 that the proposed registry service for the release of two-character domains in the gTLD namespace does not create a reasonable risk of a meaningful adverse effect on security and stability, and the Board authorizes the President and CEO, or his designee(s), to develop and implement an efficient procedure for the release of two-character domains currently required to be reserved in the New gTLD Registry Agreement, taking into account the GAC's advice in the Los Angeles Communiqué. As previously noted, in the Los Angeles Communiqué, the GAC stated that it considers the public comment period as an important transparency mechanism and asked ICANN to alert relevant governments about the requests as they arise.