



Implementation Plan for .BANK and .INSURANCE to Avoid Confusion with Corresponding Country Codes

Background

fTLD Registry Services (fTLD) submitted community-based applications for the .BANK and .INSURANCE generic Top-Level Domains (gTLDs) and was awarded the right to operate them on September 25, 2014, and February 19, 2015, respectively. fTLD launched .BANK on May 14, 2015, and will launch .INSURANCE on May 5, 2016.

fTLD, an entity that is owned, operated and governed by banks, insurance companies and their respective trade associations, operates two of the most restrictive gTLDs ever approved by ICANN. In addition to its Board of Directors, which are exclusively members of the global financial services community, fTLD formed an Advisory Council¹ to provide a community-input mechanism to the development and maintenance of its Registry Policies².

Notwithstanding the Public Interest Commitments mandated by ICANN for gTLDs representative of highly regulated sectors, fTLD has strict Registrant Eligibility, Name Selection and Acceptable Use / Anti-Abuse Policies, requires registrant verification before domain names are awarded (or renewed), and mandates numerous Security Requirements³ for itself as the registry operator as well as its registrars and registrants.

On behalf of the global banking and insurance communities, fTLD operates .BANK and .INSURANCE as trusted, verified, more secure and easily identifiable locations online for banks, insurance providers and distributors, and the consumers they serve. The leadership of fTLD believes that stringent policy requirements associated with the registration and use of .BANK and .INSURANCE two-letter domain names minimize any potential confusion with the corresponding country codes. Nonetheless, the rigid verification requirement, registration policies and Security Requirements were developed to ensure that only legitimate members of the respective communities are permitted to register and use domain names.

Implementation Plan

fTLD, in its capacity as the Registry Operator of the .BANK and .INSURANCE gTLDs, wishes to provide further details on the specific measures it has or will implement to minimize, if not altogether eliminate, potential confusion with corresponding country codes.

- fTLD is currently only releasing certain two-letter names in .BANK via a Request for Proposal (RFP) process⁴, which requires applicants to detail their proposed use of the domain name. This will allow fTLD to proactively identify any potential confusing use of the domain name with a corresponding country code. fTLD anticipates launching a similar plan for the release of similar names in .INSURANCE.

¹ See www.ftld.com/advisory-council

² See www.ftld.com/policies

³ See www.ftld.com/enhanced-security

⁴ See <https://www.ftld.com/rfp-process-single-character-and-two-letter-names/>

- All registrations are required to comply with a Registrant Eligibility Policy based on Specification 12 of fTLD's Registry Agreements with ICANN⁵, which states in relevant part that registrations are restricted to certain organizations.
- All registrations are required to comply with a Name Selection Policy based on Specification 12 of fTLD's Registry Agreements with ICANN, which states in relevant part that domain names registered in the TLDs must correspond to a trademark, trade name or service mark of the registrant.
- fTLD has partnered with Symantec, a global leader in security and verifying the authenticity of organizations, to verify the eligibility of registrants, prior to the award (or renewal) of any domain name, in accordance with fTLD's Registrant Eligibility and Name Selection Policies, and to perform re-verification upon domain name renewal or every two years, whichever comes first. fTLD makes the final decisions on all registrations.
- In accordance with GAC Advice, fTLD has created "working relationship[s] with the relevant regulatory, or industry self--regulatory, bodies, including developing a strategy to mitigate as much as possible the risks of fraudulent, and other illegal activities." Some of these relationships include, but are not limited to, the American Bankers Association, European Banking Federation, Global Federation of Insurance Associations, Insurance Europe, regulators in the United States (i.e., Federal Deposit Insurance Corporation, Federal Reserve, Office of the Comptroller of the Currency) and internationally (e.g., United Kingdom – The Financial Conduct Authority and Prudential Regulation Authority, Germany – Federal Financial Supervisory Authority, Lebanon – Central Bank of Lebanon, Australia – Australian Prudential Regulation Authority).
- fTLD has implemented an Acceptable Use / Anti-Abuse Policy incorporating GAC Advice that requires registrants to:
 - Report any material changes to the validity of registrant's authorizations, charters, licenses and/or other related credentials for participation in the gTLDs in order to ensure they continue to conform to appropriate regulations and licensing requirements and generally conduct their activities in the interests of the consumers they serve; and
 - Comply with all applicable laws, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, disclosure of data, and financial disclosure.
- Any registrant of a two-letter domain name corresponding to ISO-3166 string at the time of allocation, will be prohibited from providing third-party domain name registration services at any lower domain-name strings. For the avoidance of any doubt, this provision will prohibit the current business models such as those used for US.COM, EU.COM and UK.COM.

⁵ See <https://www.icann.org/resources/agreement/bank-2014-09-25-en> and <https://www.icann.org/resources/agreement/insurance-2015-02-19-en>