



Authorization Process for the Release of Two-Character ASCII Labels

Submission of Measures to Avoid Confusion

1. .CFD TLD [DotCFD Registry]

These comments are provided in response to ICANN's recent request for the Registry to "*provide mitigation measures to avoid confusion*" for those labels in the .CFD TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

CFD stands for 'Contracts for Difference', a financial derivatives product. The .CFD TLD is a niche TLD targeted at the financial services market and, specifically, licenced CFD service providers. The Registry is backed by a FTSE 250 trading corporation (IG Group) which has significant expertise in CFDs and the financial services market, and a good working relationship with the UK financial regulator.

The .CFD TLD Registry has developed and adopted a Registrant Eligibility Policy ("Policy") for the .CFD TLD. All domain names registered in the .CFD TLD must comply with this Policy, the objective of which is to help increase the likelihood that the TLD will function as a trusted eco-system for legitimate CFD actors.

The Policy is incorporated by reference into the Registry-Registrar Agreement and must be presented to all prospective domain Registrants. It is also available [online](#), along with full details of the [validation process](#), which is carried out by a third party (Valideus) during the domain pending create process (i.e, pre-registration).

The Policy sets forth the conditions under which an applicant for domain registration in the .CFD TLD is permitted to register a domain name, and the criteria against which the third party Validation Agent will verify any domain name applications. **As per the Policy, the only entity which is eligible to register a domain name in the .CFD TLD is: an entity holding one or more regulatory permissions granted by a financial regulatory authority in respect of the CFD space.**

It is a condition of continued registration and renewal of a domain name that the Registrant continues to meet the eligibility requirements.

As such, the DotCFD Registry believes that the Eligibility Policy and enforcement thereof mitigates any potential confusion in relation to country codes. Governments (and non-licensed entities in general) would not be eligible to register domains in the .CFD TLD as the Registry has clearly designated the TLD as being a restricted space for CFD licensed providers.

The Registry has also developed an [Acceptable Use Policy](#), by virtue of which the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive conduct, including those from Governments. Where, in the Registry Operator’s sole opinion, abuse has occurred and persists, it may cause the domain name’s records to be removed from the DNS.

Furthermore, contained within the AUP is the following text:

“[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

.....

Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

.....

Not to speak for, or on behalf of any individual, business, association, institution or other organization for which they have no authorisation”.

We ask of all our accredited Registrars (clause 3.6 of the Registry-Registrar Agreement) that they publish the Registry’s AUP to which each Registrant must agree in order to be registered as a Registrant in the .CFD TLD. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies, including the AUP.

Finally, as noted in the AUP, the AUP *“may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners.”*

The 2-characters for which we are providing this confusion avoidance plan are the following:

- ai**
- bh**
- bm**
- ci**
- cn**
- eg**
- il**
- in**
- io**
- it**
- kr**
- ky**
- me**
- ms**
- pt**
- ru**
- sg**

sh
su
tc
tw

2. .Spreadbetting TLD [DotSpreadbetting Registry]

These comments are provided in response to ICANN's recent request for the Registry to "provide mitigation measures to avoid confusion" for those labels in the .Spreadbetting TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

Financial spread betting is a tax-free way to take advantage of rising or falling markets. This financial product is currently only legitimately available in the UK and Irish markets and the .Spreadbetting TLD is a niche TLD directed at licenced spread betting providers. The Registry is backed by a FTSE 250 trading corporation (IG Group) which has significant expertise in spread betting and the financial services market, and a good working relationship with the UK financial regulator.

The Registry has developed and adopted an Eligibility Policy ("Policy") for the .Spreadbetting TLD. All domain names registered in the .Spreadbetting TLD must comply with this Policy, the objective of which is to help increase the likelihood that the TLD will function as a trusted eco-system for legitimate spread betting actors.

The Policy is incorporated by reference into the Registry-Registrar Agreement and must be presented to all prospective domain Registrants. It is also available [online](#), along with full details of the [validation process](#) which is carried out by a third party (Valideus) during the domain pending create process (i.e pre-registration).

The Policy sets forth the conditions under which an applicant for domain registration in the .Spreadbetting TLD is permitted to register a domain name, and the criteria against which the third party Validation Agent will verify domain name applications. **As per the Policy, the only entity which is eligible to register a domain name in the .Spreadbetting TLD is as follows: an entity holding one or more regulatory permissions granted by the UK Financial Conduct Authority in respect of the spread betting space or an entity holding one or more regulatory permissions granted by the Central Bank of Ireland in respect of the spread betting space.**

It is a condition of continued registration and renewal of a domain name that the Registrant continues to meet the eligibility requirements.

As such, the DotSpreadbetting Registry believes that the Eligibility Policy and enforcement thereof mitigates any potential confusion in relation to country codes. Governments (and non-licensed entities in general) would not be eligible to register domains in the .Spreadbetting TLD as the Registry has clearly designated the TLD as being a restricted space for Spreadbetting licensed providers.

The Registry has also developed an [Acceptable Use Policy](#), by virtue of which the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive conduct, including those from Governments. Where, in the Registry Operator's sole opinion, abuse has occurred and persists, it may cause the domain name's records to be removed from the DNS.

Furthermore, contained within the AUP is the following text:

"[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

.....

Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

.....

Not to speak for, or on behalf of any individual, business, association, institution or other organization for which they have no authorisation”.

We ask of all our accredited Registrars (clause 3.6 of the Registry-Registrar Agreement) that they publish the Registry’s AUP to which each Registrant must agree in order to be registered as a Registrant in the .Spreadbetting TLD. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies, including the AUP.

Finally, as noted in the AUP, the AUP *“may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners.”*

The 2-characters for which we are providing this confusion avoidance plan are the following:

ai
bh
bm
ci
cn
eg
hk
il
in
io
it
kr
ky
me
ms
pt
ru
sg
sh
su
tc
tw

3. .Markets TLD [DotMarkets Registry]

These comments are provided in response to ICANN’s recent request for the Registry to “*provide mitigation measures to avoid confusion*” for those labels in the .Markets TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

The aim of the .Markets TLD is to serve as a mark of quality for financial services on the Internet. As such, the TLD is intended for businesses / providers within the financial services space and the Registry is backed by a FTSE 250 trading corporation which has significant expertise in the financial services market and a good working relationship with the financial regulator.

In order to allay any concerns that confusion may arise with country codes, please note that the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive conduct, including those from Governments. Where, in the Registry Operator’s sole opinion, abuse has occurred and persists, it may cause the domain name’s records to be removed from the DNS.

Furthermore, contained within the Acceptable Use Policy (AUP) for the .Markets TLD is the following text:

“[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

.....

Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

.....

Not to speak for, or on behalf of any individual, business, association, institution or other organization for which they have no authorisation”.

We ask of all our accredited Registrars (clause 3.6 of the Registry-Registrar Agreement) that they publish the Registry’s AUP to which each Registrant must agree in order to be registered as a Registrant in the Markets TLD. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies, including the AUP.

Finally, as noted in the .Markets AUP, the AUP “*may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners.*”

The 2-characters for which we are providing this confusion avoidance plan are the following:

- ai**
- bh**
- bm**
- ci**
- cn**
- eg**

il
in
io
it
kr
ky
me
ms
pt
ru
sg
sh
su
tc
tw

4. .Trading TLD [DotTrading Registry]

These comments are provided in response to ICANN’s recent request for the Registry to “*provide mitigation measures to avoid confusion*” for those labels in the .Trading TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

The aim of the .Trading TLD is to serve as a mark of quality for financial services on the Internet. As such, the TLD is intended for businesses / providers within the online trading world, be they traders, agents, arbitrageurs or investors. The Registry is backed by a FTSE 250 trading corporation and has significant expertise in trading and the financial services market, and a good working relationship with the financial regulator.

In order to allay any concerns that confusion may arise with country codes, please note that the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive conduct, including those from Governments. Where, in Registry Operator’s sole opinion, abuse has occurred and persists, it may cause the domain name’s records to be removed from the DNS.

Furthermore, contained within the Acceptable Use Policy (AUP) for the .Trading TLD is the following text:

“[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

.....

Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

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Not to speak for, or on behalf of any individual, business, association, institution or other organization for which they have no authorisation”.

We ask of all our accredited Registrars (clause 3.6 of the Registry-Registrar Agreement) that they publish the Registry's AUP to which each Registrant must agree in order to be registered as a Registrant. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies, including the AUP.

Finally, as noted in the .Trading AUP, the .AUP *"may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners."*

The 2-characters for which we are providing this confusion avoidance plan are the following:

ai
bh
bm
ci
cn
eg
il
in
io
it
kr
ky
me
ms
pt
ru
sg
sh
su
tc
tw

5. .Broker TLD [DotBroker Registry]

These comments are provided in response to ICANN's recent request for the Registry to *"provide mitigation measures to avoid confusion"* for those labels in the .Broker TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

The aim of the .Broker TLD is to serve as a mark of quality for financial services on the Internet. As such, the TLD is an extension intended for stockbrokers, forex providers or others to allow them to self-identify as a recognised, specialist financial broker. The Registry is backed by a FTSE 250 trading corporation and has significant expertise in the financial services market, and a good working relationship with the financial regulator.

In order to allay any concerns that confusion may arise with country codes, please note that the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive

conduct, including those from Governments. Where, in Registry Operator’s sole opinion, abuse has occurred and persists, it may cause the domain name’s records to be removed from the DNS.

Furthermore, contained within the Acceptable Use Policy for the .Broker TLD is the following text:

“[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

.....

Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

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We ask of all our accredited Registrars (clause 3.6 of the Registry-Registrar Agreement) that they publish the Registry’s AUP to which each Registrant must agree in order to be registered as a Registrant. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies.

Finally, as noted in the .Broker AUP, the AUP *“may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners.”*

The 2-characters for which we are providing this confusion avoidance plan are the following:

- ai
- bh**
- bm**
- ci
- cn
- eg
- es
- il
- in
- io
- it
- kr
- ky
- me
- ms
- pt
- ru
- sg
- sh
- su

tc
tw

6. .Forex TLD [DotForex Registry]

These comments are provided in response to ICANN’s recent request for the Registry to “*provide mitigation measures to avoid confusion*” for those labels in the .Forex TLD that received comments from national Governments pertaining to confusion with the corresponding country codes.

The aim of the .Forex TLD is to present a section of the internet exclusively for forex (foreign exchange), be that for a foreign exchange online trading company, marketing forex platforms or providers of forex solutions. The Registry is backed by a FTSE 250 trading corporation and has significant expertise in the field of trading / foreign exchange, and a good working relationship with the financial regulator.

In order to allay any concerns that confusion may arise with country codes, please note that the Registry Operator commits to investigate any reports of misuse, including misleading or deceptive conduct, including those from Governments. Where, in Registry Operator’s sole opinion, abuse has occurred and persists, it may cause the domain name’s records to be removed from the DNS.

Furthermore, contained within our Acceptable Use Policy for the .Forex TLD is the following text:

“[Each Registrant agrees]

To comply with all applicable laws and regulations, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures

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Not to claim, falsely state, infer, or otherwise misrepresent its affiliations.

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We ask of all our accredited Registrars (3.6 of the Registry-Registrar Agreement) that they publish the Registry’s AUP to which each Registrant must agree in order to be registered as a Registrant. Per clause 7 of our Registry-Registrar Agreement, we reserve the right at our sole discretion to deny, cancel or transfer any registration or transaction, or place any domain name(s) on registry lock, hold or similar status, that we deem necessary in order to enforce Registry Policies.

Finally, as noted in the .Forex AUP, the AUP “*may be triggered through a variety of channels, including, among other things, private complaint, public alert, government or enforcement agency outreach, and the on-going monitoring by the Registry or its partners.*”

The 2-characters for which we are providing this confusion avoidance plan are the following:

ai
bh
bm
ci

cn
eg
es
il
in
io
it
kr
ky
me
ms
pt
ru
sg
sh
su
tc
tw