

Mitigation Measures to Avoid Confusion (concerning 2-letter labels in general)

Allfinanz Deutsche Vermögensberatung Aktiengesellschaft (Allfinanz) is Registry Operator for the “.ALLFINANZ”.

As stated in the New gTLD Application for “.ALLFINANZ”, 18(a) section C - the purpose of the TLD is as follows:

Professor Dr. Reinfried Pohl, in creating ALLFINANZ' parent company Deutsche Vermögensberatung AG (DVAG), developed an innovative approach to client financial management known as the “ALLFINANZ-Konzept.” The “ALLFINANZ-Konzept” is a holistic consulting approach that covers all economic and financial questions for ALLFINANZ' private clients. The Allfinanz company has become the modern incarnation of this market-leading concept, which is the guiding principal behind Allfinanz's unparalleled level of customer service and client satisfaction.

The “.ALLFINANZ” top-level domain will enable Allfinanz to communicate with all of its commercial agents in a streamlined and consistent manner, and to communicate information about the “Allfinanz” brand in single and a unified platform. The “.ALLFINANZ” top-level domain will further assist the company by providing a single location where clients may locate and engage authorized investment counsellors, research the many products and services offered by the company, and where commercial agents may advertise in a Allfinanz-endorsed, authenticated space. The “.ALLFINANZ” space will provide the company and its agents with a single, multi-functional and well-maintained forum through which to communicate to their clients and prospective consumers.

This new TLD is intended to benefit Internet users by enabling Allfinanz and its commercial agents to communicate under the unique nexus “.ALLFINANZ” more easily and effectively with all Internet users, and particularly with their many customers, employees and affiliates.

The “.ALLFINANZ” Registry Service Provider will manage the Internet space under the direct control of Allfinanz. This will allow the distribution and exchange of information between Allfinanz, their authorized commercial agents, and their relevant stakeholders by means of, but not limited to, websites, social networks, email and other technologies that will reside within the “.ALLFINANZ” domain name space.

Allfinanz envisages the TLD to follow a single-registrant model, wherein all registrations within the space are held by the Allfinanz company itself. Allfinanz's commercial agents, appropriate corporate divisions, or other affiliated entities may apply to the Legal department of Allfinanz to request authorization to license such registrations for their own use. Allfinanz shall review such requests and, in its sole discretion, may grant such licenses on a case-by-case basis. In all cases, Allfinanz shall monitor the use of all “.ALLFINANZ” domain names to ensure that the content of the associated websites remains current and appropriate to the “.ALLFINANZ” space, and does not violate third parties' rights. Furthermore, all host records have to be approved by both the legal and the IT department of Allfinanz prior to creation.

For the “.ALLFINANZ” TLD Allfinanz has applied for and been granted an exemption to the registry operator code of conduct under Specification 9 to the Registry Agreement. This code of conduct exemption already contractually requires that the Allfinanz will apply measures which, by their very nature, avoid confusion with the corresponding country code, namely the following:"

- Developing and implementing a closed registration policy for “.ALLFINANZ” that requires that all domain names in the TLD be registered and used by Registry Operator and its affiliates;
- Clearly publishing the registration policy on Registry Operator’s homepage for .[TLD]; and
- Enforcing of the registration policy for “[TLD]” and ensuring continued compliance, including through annual recertification of “.ALLFINANZ”’s qualification for an exemption to the Registry Operator Code of Conduct.

This publicly available registration and usage policy would prevent any third party from registering domains in the “.ALLFINANZ” TLD. It would clearly designate to the public that “.ALLFINANZ” was a proprietary space in which all second-level domains in the TLD were being operated by Allfinanz, and not anyone else for any other purpose.