



IMPLEMENTATION PLAN FOR .PHARMACY TO AVOID CONFUSION WITH CORRESPONDING COUNTRY CODES

Background

The National Association of Boards of Pharmacy® (NABP®), the impartial professional organization that supports state boards of pharmacy¹ in protecting public health, is the exclusive Registry Operator for the .pharmacy Top-Level Domain (TLD). The .pharmacy TLD was established to provide a secure, verified, and trustworthy TLD where consumers around the globe can be sure the medications they buy online are safe. To that end, a global coalition of stakeholders, including NABP and the International Pharmaceutical Federation, developed policies and maintains standards to govern the .pharmacy TLD, ensuring those websites with a .pharmacy domain are safe and legal.

Implementation Plan to Avoid Confusion

To respond to the confusion concerns cited by several governments² regarding the use of the second-level domains (SLDs) in the .pharmacy TLD, NABP notes that it currently implements a restricted registration policy for .pharmacy that recognizes the ongoing and critical need for patients' medications to be managed by a licensed pharmacist and for their medications to be appropriately sourced in accordance with applicable standards of care. A copy of the policy can be found at <http://safe.pharmacy/standards-policies>. The very fact that .pharmacy verifies³ that each entity acquiring a .pharmacy SLD meets all applicable regulatory standards, including those addressing pharmacy licensure and valid prescription requirements, *prior* to allowing that entity to register a .pharmacy domain name avoids any potential confusion between the .pharmacy registration and a country code.

¹ NABP's member boards of pharmacy are grouped into eight districts that include all 50 United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, Australia, Bahamas, nine Canadian provinces, and New Zealand. The Association is governed by its Executive Committee, whose officers and members are elected during the Association's Annual Meeting.

² The two-character country codes that NABP is providing for 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, and .tw.

³ Verification prior to domain name use is employed by several other "verified" registry operations. Similar to NABP's administration of .pharmacy, these organizations verify that the registrant complies with the program's eligibility standards (ie, holds a professional license making the registrant eligible for the domain name) prior to permitting use of the domain name. Verification is a program standard that distinguishes these organizations from other restricted and community TLDs. NABP submits that these verified registry operations are similarly situated to .pharmacy and avoid confusion in an analogous manner. No government explicitly commented on potential confusion within a *verified* registry operation during the comment period.



Implementation Plan for .Pharmacy to Avoid Confusion With Corresponding Country Codes

In order to ensure that there will be no confusion between any two character registrations and a country code sharing the same two letters, NABP will administer its verified registry operation in a manner that avoids potential confusion by:

- Continuing to implement a restricted registration policy for .pharmacy that verifies that each entity acquiring a .pharmacy SLD is an [eligible member of the pharmacy community](#) and meets [all applicable regulatory standards](#) to conduct pharmacy-related business.
- Continuing to implement a restricted registration policy that ensures website content is relevant to pharmacy services and drug information, which provides the opportunity for NABP to proactively identify any potential confusing use of the domain name with a corresponding country code.
- Maintaining, and continuing to create, ongoing “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.” See [Beijing GAC Communique](#). NABP will not issue a .pharmacy domain name in a given country until it [has created a relationship with the appropriate health care regulators for a jurisdiction](#).
- Clearly publishing this registration policy on .pharmacy’s registry [homepage](#).
- Including this registration policy in NABP’s Registry-Registrar Agreement with all accredited registrars for the .pharmacy TLD.
- Enforcing this registration policy and ensuring continued compliance. The process for obtaining a .pharmacy domain name is described here: <http://www.safe.pharmacy/apply>. More detailed instructions and information are available here: <http://www.safe.pharmacy/apply/application-instructions>.

NABP’s use of .pharmacy two-character domains would not, in and of itself and absent a verification process, cause any confusion with the corresponding two-letter country codes; nonetheless, NABP further contends that it avoids any potential confusion through its strenuous verification requirements and registration policies, which ensure only licensed and verified pharmacy-related entities are permitted to register and use .pharmacy domains.

Request to ICANN in Accordance With Specification 5 of the Registry Agreement

Based on public comments received, no government objecting to the release of its country code offered a specific explanation for the potential confusion arising from the use of a two-character SLD within a verified registry operation (as defined herein); therefore, based on the aforementioned proposal to avoid confusion as a verified registry operation and in accordance with Specification 5 of its Registry Agreement, NABP respectfully requests that Internet Corporation for Assigned Names and Numbers release the remainder of all second-level two-character country code domain names.

