

## United TLD Comment on proposed measures to avoid confusion with specific country codes at the second level.

United TLD Holdco Ltd., trading as Rightside Registry (“Rightside”), a registry operator and applicant for new generic top level domain names (gTLDs) wishes to thank ICANN for the opportunity to comment on a proposed solution for the avoidance of confusion with specific country codes at the second level.

### INTRODUCTORY COMMENT

It is noted that the avoidance of potential confusion between country codes and 2 character registrations at a second level, has previously been the subject of discussion and decision by the ICANN Board and has been subsequently implemented within a section of the DNS. In the interest of consistency and proportionality to all providers concerned, Rightside would support the availability of a similar option in this instance.

### Phased Allocation

The proposed method is as follows:

Upon the release of the letter/letter combination, corresponding to one of the remaining objected to country codes, the relevant Registry Operator will provide an exclusive thirty (30) day period in which registration of such letter/letter combination will be solely made available to the applicable country code manager as listed at: <http://www.iana.org/domains/root/db/>.

As noted, this type of phased allocation has been previously approved by ICANN as an acceptable and complete measure to avoid confusion with applicable country codes, namely for *.TRAVEL* in which the Board approved an amendment to the *.TRAVEL* Registry Agreement permitted release of 2 characters through a Phased Allocation Program<sup>1</sup>.

The current wording of the *.TRAVEL* Specification 5 is as follows:

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<sup>1</sup> <https://www.icann.org/resources/unthemed-pages/travel-appendix-7-2010-08-23-en>

All single-character and two-character labels that were previously reserved by the Registry Operator prior to the Effective Date of this Registry Agreement may be allocated through ICANN-accredited registrars according to a phased allocation program (“Phased Allocation Program”). The domain names included within the scope of the Phased Allocation Program shall be limited to a single and two-character labels. Registry Operator reserves the right to not allocate all single and two-character labels. Pursuant to the Phased Allocation Program, Registry Operator may elect to allocate labels by applying one or more of the following processes: 1) request for proposals and allocation based on evaluation criteria; 2) auction; or 3) first come, first serve registration.

Similar Phased Allocation Programs have been approved by ICANN as an implementation of measures to avoid confusion with corresponding country codes in .BIZ, .INFO, .ORG, and .JOBS.

Please note that the phased allocation proposal is considered to be suitable for a registry operator such as Rightside Registry, with a portfolio comprised of forty open, generic TLDs. However, we would also lend our support to the approval of multiple options, so as to ensure that all registry types are adequately considered and provided for.

### **Conclusion**

In the interests of consistency, the proposed ‘Phased Allocation’ is considered to be an adequate and proven measure, fit for discharging any confusion applicable to the remaining 2<sup>nd</sup> level, 2 characters strings.

