

## **Proposed Two-Character Label Confusion Mitigation Measures for .CBA, .COMMBANK and .NETBANK.**

### Background:

.CBA, .COMMBANK and .NETBANK are owned and operated by the Commonwealth Bank of Australia as .BRAND TLDs. A Specification 13 exemption is in place for each of these.

The Commonwealth Bank of Australia would like to adopt the measures drafted by RySG in ICANN 55 Marrakech.

### Protections:

Commonwealth Bank of Australia for the .CBA, .COMMBANK and .NETBANK TLDs has executed Specification 13 to the Registry Agreement. Specification 13 already contractually requires that the Commonwealth Bank of Australia will apply measures which, by their very nature, avoid confusion with the corresponding country code, namely the following:

1. .CBA, .COMMBANK and .NETBANK are identical to qualifying registered trademarks;
2. .CBA, .COMMBANK and .NETBANK are not Generic Strings (as defined in Specification 11);
3. .CBA, .COMMBANK and .NETBANK TLDs have developed and will implement a closed registration policy for .CBA, .COMMBANK and .NETBANK that requires that all domain names in the .CBA, .COMMBANK and .NETBANK TLD be registered ONLY by Registry Operator, its Affiliates, and its Trademark Licensees;
4. As required under the Registry Agreement, the .CBA, .COMMBANK and .NETBANK TLDs will clearly publish this registration policy;
5. .CBA, .COMMBANK and .NETBANK TLDs will conduct internal reviews at least once per calendar year to ensure continued compliance with Specification 13.

Compliance with Specification 13 prohibits the .CBA, .COMMBANK and .NETBANK TLDs from registering domain names to unaffiliated third parties and thus clearly designate to the public that .CBA, .COMMBANK and .NETBANK TLDs are proprietary spaces in which all second-level domains in the TLDs are being operated by Commonwealth Bank of Australia, its Affiliates and Trademark Licensees and not by any government or the corresponding country code operator.

By this document Commonwealth Bank of Australia confirms that all registrations of two letter domain names shall comply with the requirements of Specification 13.