



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

Proposed Service

Name of Proposed Service:

Technical description of Proposed Service:

Currently, Specification 5 of the Registry Agreement executed on July 24, 2014, between Charleston Road Registry Inc. d/b/a Google Registry and ICANN for the .GOOGLE TLD specifies that two-character domain names should be initially withheld from registration and use. We now propose that all two-character domain names be released. These domains will be subject to all registration policies of .GOOGLE, which include measures to prevent confusion with the corresponding country codes as detailed in its answer to Question 22 in the new gTLD application for .GOOGLE. This is a simple extension of the available namespace, anticipated by Specification 5 of the .GOOGLE registry agreement. As such, it is not a "New" or "Proposed" Registry Service which requires a material change to the .GOOGLE registry agreement. This extension of the namespace can be effectuated by ICANN invoking its authority under Specification 5 to expressly authorize changes in writing, i.e. an approval of this RSEP request.

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

Please see our more detailed response to this question below.

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

The .GOOGLE TLD is not a sponsored TLD.

b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

The .GOOGLE TLD is "a closed registry with Google as the sole registrar and registrant." See Charleston Road Registry, .GOOGLE New gTLD Application Response to Question 18(b)(i)(1) (June 13, 2012). More specifically, "only registry operator, its affiliates or its trademark licensees are eligible to be registrants of domain names in the TLD and control the



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

DNS records associated with domain names at any level in the TLD." See Charleston Road Registry, .Brand TLD Application for .GOOGLE, ¶ (iii) (May 16, 2014). As an approved .Brand TLD, Google Registry may decide to designate for the .GOOGLE TLD "no more than three ICANN accredited registrars at any point in time to serve as the exclusive registrar(s) for the TLD." See ICANN, Specification Thirteen, ¶ 3 (April 11, 2014). Accordingly, primarily because Google will serve as the sole registrar for the .GOOGLE TLD, no consultations with third party registrars or the RrSG were appropriate, and no such registrars have been consulted. Google Registry has consulted with Google Inc., which is an ICANN-accredited registrar, a separate legal entity, which did not identify any concerns in releasing two-character domain names, technical or otherwise.

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Community-wide consultations by Google Registry began with the .GOOGLE new gTLD application, which in pertinent part reads as follows: CRR shall ensure that all geographic abbreviation identifiers contained within the ISO 3166-1 list will be reserved to us as the registry operator. ... [T]he registry shall not make any of these identifiers publicly available for registration. CRR plans to make these two letter geographic abbreviation identifiers available to Google to provide localized content via second-level domains. Google's Web Search and other services are customized for a number of countries and regions across the world, and these two letter second level domain names would be used to provide a namespace to which that customization could be applied. For example, BW.GOOGLE could provide search results that would be most relevant for users in Botswana. It could allow Google to direct users to the site that can give them the most relevant results. CRR notes that confusion regarding whether the second-level domain is an official conduit of the affected country should be of minimal concern for governments in the context of a closed registry whose TLD is the trademark of a private entity and where all usage of the domain is directly tied to Google's brand and offerings. ... [T]here should be a minimal possibility of creating geopolitical conflicts in the top-level domain resulting from confusion associated with national government websites. Further, it is not CRR desire to serve TLDs that compete with national ccTLDs, rather to serve Google's users more localized content in a given region. Google's core business functions include facilitating searches for Internet content and communications among Internet users. In connection with these functions, CRR intends to fully utilize the abbreviated country code names to harness the TLD to provide localized content, especially to the developing world. Throughout 2011, several chapters of the Internet Society in developing nations have found that despite growing connectivity in their nations, Internet usage and electronic commerce were not thriving due to a lack of localized content. Google's localized sites shall help provide a means of rectifying this situation, ensuring that Internet users in developed and developing nations have access to substantive content that is relevant to their lives. While the development and deployment of specific localized sites will depend upon global and local demand and the technological integration of new gTLDs into the larger Internet fabric, Google's goal is to continually expand its usage of localized sites in the top-level domain. See Charleston Road Registry, .GOOGLE New gTLD Application Response to Question 22 (June 13, 2012). Google Registry has received no objections or public comments to date opposing the release of all two-character domain names as provided in its .GOOGLE new gTLD application, despite an explicit comment period and over two years' of opportunity for any affected parties to do so. Moreover, Google Registry has followed with interest discussions regarding the release of all two-character domain names, particularly those on the ISO



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

3166-1 list. See e.g. GAC, Singapore Communique (March 27, 2014) (noting that it "discussed the Brand Registry Group proposal for a streamlined process under an addendum to the Registry Agreement for the approval of country names and two-letter and character codes at the second level," and that it "has no major concerns about brand owners seeking approval for such names," but that any approvals sought should be "done directly with the countries concerned rather than through a GAC-level operational process"). Google Registry directed its outside counsel to consult with the Brand Registry Group on two-character domain names. The Brand Registry Group favors the release of two-character domains to .Brand registry operators, and, at the suggestion of ICANN counsel, they are presently endeavoring to develop a "RSEP BRG member template to release two-character codes and country names." See Brand Registry Group, Potential Members Briefing ICANN 50 London (June 2014). This approach has recently been confirmed in pending RSEP requests to release two-character domain names--specifically that "senior ICANN staff" had "identified the RSEP as the appropriate process for releasing [two] character SLDs." Top Level Design, LLC, Two Character Name Allocation Proposal (February 5, 2014). Ultimately, we note that the plain language of the .GOOGLE Registry Agreement permits a registry operator to release ISO 3166-1 names upon either "agreement with the related government[s] and country-code operator[s]" or "based on [registry operator's] implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN." See ICANN, .GOOGLE Registry Agreement, Specification 5, ¶12 (July 24, 2014). As noted in our .GOOGLE new gTLD application, confusion regarding whether a two-character second-level domain is an official conduit of an affected country is minimal in the context of a closed registry whose TLD is the trademark of a private entity and where all usage of the domain is directly tied to Google's brand and offerings.

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Only Google, its affiliates or its trademark licensees are eligible to be registrants of domain names in the .GOOGLE TLD and control the DNS records associated with domain names at any level in the TLD. Accordingly, upon internal reflection, we confirm a high demand for two-character domain names among potential registered names holders, namely Google Registry, as well as our affiliates and trademark licensees in order to better target their offerings to non-English dominant populations. To this end, with respect to all potential end users for the .GOOGLE TLD, we also note the impressively expansive popularity that URL shortening services have garnered among Internet users. See e.g. Google, Google URL Shortener (September 2010); Jenna Wortham, *The New York Times*, Goo.gl Challenges Bit.ly as King of the Short (December 14, 2009) (noting that "2.1 billion Bit.ly links were clicked in November [2009], compared to 11.8 million a year ago"). The release of two-character domain names will inherently shorten URLs in the .GOOGLE gTLD, allowing Google to create more memorable and appealing URLs. Based on the closed nature of the .GOOGLE gTLD and the undeniable popularity of shorter domain names, no consultations with end users were appropriate, and no end users, outside of potential registered name holders, were consulted.

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

As detailed above, the Brand Registry Group favors the release of two-character domains to .Brand registry operators, concluding that any "prohibition [against two-character domain names] is at odds with .brands' hopes to provide relevant online content globally." See Brand Registry Group, *Proposal for the Use of Country Names and Two-Character Strings* (September 19, 2013). ICANN recently concluded its public comment process on the introduction of two-character domain names in the new gTLD namespace. This public comment period serves as an appropriate Litmus test as to individuals and entities generally support the release of two-character domain names, beyond .Brand new gTLDs. Specifically, the ICANN At-Large Advisory Committee concluded that "all the restrictions of two character ASCII labels at the second level within a TLD should ultimately be removed," confirming that it "had no problem with the current exceptions being approved" because they "have [already] been made available for some gTLDs and many ccTLDs" and "[s]horter domains are more desirable to potential registrants." See ALAC, *ALAC Statement on the Introduction of Two-Character Domain Names in the New gTLD Namespace* (August 16, 2014). In addition, Top Level Design LLC, in supporting its request with respect to the .WIKI namespace, noted that "there have been very few detracting comments," explaining that the release of two-character domain names "has a number of access benefits, especially for developing countries, and increases the visibility of an award winning information resource, Wikipedia." See Andrew Merriam, *Top Level Design Two Character Comments* (August 1, 2014). Google Registry also submitted comments supporting the release of two-character domain names by delineating established precedent in the operation of other gTLDs, noting that ICANN has uniformly approved all RSEP requests to release two-character domain names over the past eight years. Sarah Falvey, *Google Registry Reply Public Comment on Two-Letter Second Level Registrations* (August 1, 2014). Finally, strong support was also expressed by FairWinds, Hewlett-Packard Company, Uniregistry Corp., and DOTZON. See FairWind Partners, *Comments Submission* (July 10, 2014); Casey Nakata, *Hewlett-Packard Company: Comments to ICANN* (July 10, 2014) (supporting at least qualified release); Brett Fausett, *Support for Release of Two Letter Domains* (July 10, 2014) (reasoning that "new gTLDs should not face restrictions not placed on legacy TLDs such as .COM or ccTLDs"); Katrin Ohlmer, *DOTZON Comment* (July 10, 2014) (concluding that restrictions are "incompatible with competition laws, unnecessary and should be amended"). We also note long standing support for the release of two-character for .Brand gTLDs from several ICANN constituencies and individual stakeholders. For example, the Intellectual Property Constituency has opined that "dot brand TLDs are unique in that they will be restricted spaces, i.e. they will exercise a degree of control over domain name registrations within their respective TLDs," meaning that "it seems unnecessary to rigidly apply current blanket restrictions against all second-level country codes and country names within restricted dot brand registries." IPC, *Comments of the IPC on the Proposed Final New gTLD Registry Agreement* (June 11, 2013). Likewise, the ICANN Business Constituency has repeatedly requested an "exception that allows single-registrant TLDs to register domains for their markets and operations based in countries and territories." BC, *Comments on Proposed Final New gTLD Registry Agreement* (June 11, 2013). This sentiment was joined by several other individual stakeholders and industry groups as well, absent any opposition or negative reply comments. See e.g. Valideus Ltd., *Richemont DNS Comments on ICANN's Proposed Final New gTLD Registry Agreement* (May 20, 2013) (noting "it would be highly inefficient for the registries to individually reach agreement with the governments and country-code managers"); Elizabeth Sweezy, *FairWinds Partners Comment to ICANN on the Proposed Final New gTLD Registry Agreement* (May 20, 2013); Gertrude Levine, *NABP Comment On ICANN Registry Agreement* (May 16, 2013) (requesting that ICANN "allow the release of reserved geographic names and two-character labels for use by the Registry Operator in



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

conjunction with the promotion or operation of the registry").

f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

Opposition to the release of two-character domain names for .Brand TLDs is minimal at present, as made evident by the lack of opposition to the .GOOGLE new gTLD application, and the same Litmus test described above, namely the public comment process on the introduction of two-character domain names in the new gTLD namespace. Only three individuals submitted comments opposing the release of two-character domain names, none of which specifically addressed .Brand gTLDs. To the contrary, one individual from ALAC generally opposed the release of two-character domain names yet importantly also recognized the capability "to meet the threshold that the use will not be confused with the corresponding country codes." See Dev Anand Teelucksingh, Re: Introduction of Two-Character Domain Names in the New gTLD Namespace (July 10, 2014).

Timeline

Please describe the timeline for implementation of the proposed new registry service:

Implementation would be done immediately upon approval.

Business Description

Describe how the Proposed Service will be offered:

Given that .GOOGLE is a branded space reserved for the sole use and management by Google Registry these two-character codes will not be offered to the public for sale or use. Rather, these two-character domain names will be under the sole discretion of Google Registry and Google Inc.

Describe quality assurance plan or testing of Proposed Service:

N/A

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

Benefits of Service

Describe the benefits of the Proposed Service:

Google Registry plans to make these these two letter geographic abbreviation identifiers available to Google to provide localized content via second-level domains. Google's Web Search and other services are customized for a number of countries and regions across the world, and these two letter second level domain names would be used to provide a namespace to which that customization could be applied. For example, bw.Google could provide search results that would be most relevant for users in Botswana. It could allow Google to direct users to the site that can give them the most relevant results.

Google would be able to customize its sites for a number of countries and regions across the world, and harness these its branded TLD to provide localized content, especially to the developing world. Throughout 2011, several chapters of the Internet Society in developing nations have found that despite growing connectivity in their nations, Internet usage and electronic commerce were not thriving due to a lack of localized content. By using its branded TLD, Google would be able to utilize the full spectrum of second-level registrations to build recognizable and meaningful sites as a means to rectify this situation, ensuring that Internet users in developed and developing nations have access to substantive content that is relevant to their lives. While the development and deployment of specific localized sites will depend upon global and local demand and the technological integration of new gTLDs into the larger Internet fabric, Google's goal is to continually expand its usage of localized sites in the top-level domain.

As a timely example of the benefit, Google would like to launch localized versions of its search services for Liberia and Guinea, countries that have been hit hard by the current Ebola crisis. Historically, Google has used domain names within relevant country code TLDs (e.g., google.de or google.co.ke). Because Google does not have a local office in these countries, it does not qualify for registration in the relevant ccTLDs (.lr and .gn, respectively). With the ability to register and launch localized sites on the lr.google and gn.google SLDs, Google would have the ability to launch localized versions of its search services for these populations to help provide information that may be helpful to local populations in addressing the crisis.

Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

Two-character names will increase consumer choice and trust by allowing Google Inc to offer tailored, segmented domain names, as well as the ability to utilize a full array of marketing and brand protection opportunities. In that vein, releasing two-character names only stands to increase competition in the domain name industry and online, rather than hinder it in any manner.

How would you define the markets in which your proposed Registry Service would compete?:



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

Given that the service requested would only be available to Google Registry and Google's sole management and use allowing the use of two-letter domain names at the second-level for .GOOGLE would not impact any other market. This service would not impact the ability for any competing service or other resource to enter the market.\r\n\r\n\r\n\r\n

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

Numerous incumbent registries, including specifically Afilias Limited, Neustar, Registry Pro LTD., TLD Ltd., Verisign, Public Interest Registry, DotAsia Organization Ltd., Telnic Ltd., Fundacio puntCAT, Tralliance, DotCooperation LLC, EmployMedia LLC, Global Name Registry LTD and nearly all ccTLDs, are already permitted to allocate two character labels, regardless of whether they appear on the ISO 3166-1 alpha-2 list.\r\n

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

No.\r\n\r\n\r\n\r\n

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

Our back-end registry services operator Google Inc. will operate the Shared Registration System (SRS) infrastructure, which will be configured to provide for the release and allocation of two character labels under the same parameters as all other eligible labels, for the .GOOGLE TLD.\r\n

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

N/A\r\n\r\n\r\n\r\n

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

N/A\r\n\r\n\r\n\r\n



ICANN Registry Request Service

Ticket ID: X9B0F-0R3Y8

Registry Name: Charleston Road Registry Inc.

gTLD: .google

Status: ICANN Review

Status Date: 2014-11-20 18:15:09

Print Date: 2014-11-20 18:24:44

Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

No.\n\n

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

The proposed service will have no effect.\n\n

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

No technical concerns have been raised.\n\n

Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

The proposal does not increase any risk of intellectual property infringement.

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No.\n\n

List Disclaimers provided to potential customers regarding the Proposed Service:

N/A

Any other relevant information to include with this request:

No.\n\n