

## CWG UCTN interim report

### Comments from the Federal Office of Communications, Switzerland

Thank you for the opportunity to submit our comments to the interim report.

The discussion on the use of country and territory names as TLDs -and geographical names in general- have been very controversial in the community in the past.

In this context, we consider that the rules contained in the current applicant guidebook, in particular in section 2.2.1.4.1, which are a result of long discussions cross-community efforts, should be recognized as a compromise and a baseline for the future treatment of country and territory names as new TLDs.

In this regard, we would also like to reference key standing advice from the GAC:

- the GAC Principles from 2005 on ccTLDs (point 8.3.), the GAC Principles from 2007 on gTLDs (point 2.2).
- the Nairobi Communique from 2010, specifically that:

*“The GAC restates the advice contained in the Chair’s letter of 18 August 2009 which states: —Strings that are a meaningful representation or abbreviation of a country name or territory name should not be allowed in the gTLD space”. The GAC interprets para 2.2 of the GAC gTLD principles that strings which are a meaningful representation or abbreviation of a country or territory name should be handled through the forthcoming ccTLD PDP , and other geographical strings could be allowed in the gTLD space if in agreement with the relevant government or public authority.”*

Accordingly, we consider that the main forum for discussions on country or territory names as TLDs should be the ccNSO and/or a specific community wide process, in form of a cross-community working party where at least the CCNSO and the GAC, apart from interested parties from the GNSO, would need to participate.

While these discussions take place the relevant provisions from the 2012 Applicant Guidebook on the matter, especially Section 2.2.1.4.1, should remain in place.