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San José, Costa Rica

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NIC Costa Rica is the ccTLD manager of .cr domains since 1990. We are not for profit organization part of the Costa Rican Academy of Science. NIC Costa Rica also leads national scale projects related to cybersecurity, Internet Governance, Internet infrastructure, DNS and network trainings on global best practices and we host the national Internet Exchange Point, among many other initiatives to promote the growth and resilience of the Internet. NIC Costa Rica is part of the ccNSO.

As part of the Public Comment Period regarding the Interim Paper Cross-Community Working Group on Use of Names of Countries and Territories as Top Level Domains, we would like to comment the following:

1. We support CWG-CTN's decision to continue protecting two letter country code domains as stated in page 20 of the Interim report: *“The CWG recommends that the existing ICANN policy of reserving 2-letter codes for ccTLDs should be maintained, primarily on the basis of the reliance of this policy, consistent with RFC 1591, on a standard established and maintained independently of and external to ICANN and widely adopted in contexts outside of the DNS (ISO 3166-1).”*
2. Due to the lack of consensus reached by the CWG-CTN after years of discussion regarding three letter codes and country name TLDs, we do not see how extending this discussion can lead to different results. It is clear that allowing generic domains to include the ISO 3166-1 codes and country names is a controversial issue that does not lead to consensus of the global Internet community. As such, we recommend that this discussion is not continued and the Use of Country and Territories a Top Level Domains continues to be protected as it has been in previous rounds.
3. We strongly believe, that the use of the ISO 3166-1 codes and country names as TLDs has a very significant intangible value strongly related to the sovereignty and reputation of a country. Allowing third parties to use a country name can create confusion with the current ccTLD, and also link a country's reputation with undesirable ideas that makes these domains extremely sensible and should be protected.





4. If for any case, this discussion is prolonged within the ICANN community, we strongly believe that all SO and AC's need to be included, informed and participate in the discussion. If a PDP process is advised at any time, this process needs to happen within the ccNSO and include other groups, particularly the GAC. In any case, it should never solely take place within the gNSO due to the sensitivity of the issue at hand and the direct impact on the ccNSO and GAC in particular.

Best regards,

A handwritten signature in black ink, appearing to read 'Pedro León', with a stylized flourish at the end.

Dr. Pedro León
President of the Academy of Science

The logo features the lowercase letters 'n!cr' in a bold, sans-serif font. The dot of the exclamation mark is a solid red circle.

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