**APTLD Community’s Comments on the Supplemental Initial Report of the New gTLD Subsequent Procedures Policy Development Process under Track 5**

APTLD is grateful for an opportunity to comment on the Supplemental Initial Report of the New gTLD Subsequent Procedures Policy Development Process.

We would like to commend the Working Group for their commitment and extensive research into and analysis of a broad array of issues that form the most challenging agenda for the community.

APTLD is pleased to see that the fundamental recommendations of the Report are in line with the APTLD community’s opinions, expressed in Statements made at APTLD71 (<https://www.aptld.org/announ/201804/announ_45.html>), APTLD72 (<https://www.aptld.org/announ/201711/announ_27.html> ), and APTLD74 (<https://www.aptld.org/documents/Others/201809/APTLD%20Statement%20on%20Country%20and%20Territory%20designations%20as%20Tops.pdf>), which were further corroborated by the other Regional Organizations.

In a nutshell, APTLD community's previous statements supported the continuation of the 2012 round AGB status quo regarding country and territory designators as top level domains.

As to more nuanced recommendations, APTLD believes that insofar country names designated on the “Separable Country Names Lists” should be made unavailable, so should their translations to different languages and separable components of country names

Also, as the Report recommends that “strings resulting from permutations and transpositions of alpha-3 codes listed in the ISO 3166-1 standard should be allowed”, we would like to note that the recommendation in question is in conflict with another one that holds that Alpha-3 codes listed in the ISO 3166-1 standard are recognized as reserved as unavailable, which effectively implies a blanket ban on the above combinations. In light of that we recommend that for the sake of consistency the former recommendation should be deleted.

Further, in our view, the recommendation that holds that, Names by which a country is commonly known, as demonstrated by evidence that the country is recognized by that name by an intergovernmental or treaty organization, calls for the need to establish a dedicated procedure to detect and demonstrate respective evidence.

We also agree with the Working Group on most of questions posed to the community; however, some of them seem to have already been answered. More specifically, Question 1, that invokes “rights” and “ownership” has long been clarified in RFC 1591 which holds that, Concerns about "rights" and "ownership" of domains are inappropriate. It is appropriate to be concerned about "responsibilities" and "service" to the community.

Likewise, we suggest that the question about the appropriate role of geographic communities and governments in respect to the said “rights” and “ownership” is self-explanatory as such matters indisputably fall under a given jurisdiction’s domestic law.

In regard to the Working Group’s question as to What is a geographic name for the purposes of the New gTLD Program? Does the intended use of the string matter?, we are of opinion that the UN documents (<http://www.un.org/Depts/Cartographic/english/geoinfo/geoname.pdf> in the first place) provide an exhaustive set of criteria which are fully applicable to the New gTLD Program; that said, while the intended use of the string does matter, the ultimate decision should be made by a national government in pursuit and in full account of the public interest.