

Singapore’s Comments on the Supplemental Report on the New GTLD Subsequent Procedures Policy Development Process (Work Track 5 on Geographic Names at the Top Level)

Issue/Item	Comment
Preliminary Recommendations 2, 3, 4, 5, 7, 8, 9, 10	Singapore supports Preliminary Recommendations 2, 3, 4, 5, 7, 9 and 10, and also supports the recommendation to add clarity to the 2012 AGB in Preliminary Recommendation 8.
Question e3	We would prefer to have more preventive mechanisms in place as opposed to the curative ones. Reason being ex-ante measures are usually more manageable than ex-post measures which can sometimes be costly and time-consuming.
Proposal 1	We support this proposal to develop an online tool for prospective applicants where they can check whether a string is eligible for delegation and whether there are issues that require further action. This is helpful and could prevent situations where applicants and/or governments get dragged into protracted negotiations.
Proposal 3	We do not support the proposal to provide mediation services to assist if the applicant disagrees with the response issued by a government or public authority. Doing so might lead to long-drawn negotiations and undermine the government or public authority’s voice.
Proposal 5	We do not support the proposal to impose a deadline by which a government needs to respond when asked to provide a letter of support or non-objection. We also do not support the concept that it would be taken as the government having no objection if it does not respond to the request on time. This is because different governments work differently and it would not be fair to subject them to the same timeline or response timeframe.
Proposal 7	<p>Similar to our comment for Question e3, we do not support this proposal as it seeks to eliminate preventive measures from the process and only focuses on having curative measures. Curative measures might be time-consuming and costlier for the parties involved.</p> <p>We do not support having the government’s “right to object” expire after a set period of time. The proposal currently shows no mechanism to notify a government when or if its country/territory name is being applied for. It would be difficult/impossible for a government to submit its objection if it does not even know that its country/territory name has been applied for.</p>
Proposal 8	We support the proposal that a confusingly similar string to a geographic name should also require a letter of government support or non-objection.

Proposal 14

We support this proposal that as long as a country can provide substantial evidence that the country is recognised by a name, the term should be included under the reserved names category “A name by which a country is commonly known”.