**Input by the Communication and Information Technology Commission (CITC), KSA on**

**The new gTLD Subsequent Procedures Policy Development Process**

**(Work Track 5 on Geographic Names at the Top Level)**

We would like to thank you for the opportunity to provide and contribute to the best of the internet community. Please find below some general comments and specific comment on some of the points:

1. **General Comments:**

* The term geographic names in our belief carries a meaning that is beyond countries and cities. This term covers *inter alia* currencies, water bodies, landforms, regions and sub-regions. Thus, only the community of the internet represented by the governments and inter-governmental organizations are able to examine and decided on names that are geographical or carry a geographical meaning or relation which requires from the ICANN to provide more support to those parties to act upon their respective role.
* For efficiency and to streamline the process governments and inter-governmental organizations shall be granted to officially submit letters of support, non-objection, and objection and interact with the ICANN regardless of their membership status in the GAC.
* To avoid complications during the application process, translations of strings shall be considered and reserved as indicated in the specific comments below.

1. **Specific comments on some recommendations and proposals:**

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| **Item** | **Comments** |
| Preliminary Recommendations 2 | As a caution for future development in the international level all two-character combination shall be reserved regardless of the coding used.  Also we strongly don't accept the initial report's proposal that seeks permission for 2 character domain names as gTLDs, so long as one of the characters is a numeric digit<<https://gnso.icann.org/sites/default/files/file/field-file-attach/subsequent-procedures-initial-annex-c-02jul18-en.pdf>> for the following reasons:  - All 2-letter ASCII codes, whether or not in the ISO 3166 alpha-2 list, have historically been reserved for ccTLDs.  - It is possible that the ISO 3166 Maintenance Agency may, at some point in the future, begin to assign 2-character alpha-numeric strings as Country and Territory code points.  - Introduction of 2-character strings containing a digit may well cause visual confusion for the internet-user, thus leading to security issues within the DNS.  - Creating 2-letter ASCII TLDs (regardless of inclusion of numeric characters or not) would crack a solidly established notion among Internet users that "all ASCII ccTLD identifiers are two letters long, and all two-letter top-level domains are ccTLDs |
| Preliminary Recommendations 3 | Agree with the recommendation. |
| Preliminary Recommendations 4 | Translations of strings (long-form country/territory names) should be addressed and reserved. |
| Preliminary Recommendations 5 | Translations of strings (short-form country/territory names) should be addressed and reserved. |
| Preliminary Recommendations 6 | Agree with the recommendation. |
| Preliminary Recommendations 7 | Translations of strings (separable components of country names) should be addressed and reserved. |
| Preliminary Recommendations 8 | Also translations of strings to any language shall be reserved.  To reduce the risk of misuse of domain names the strings resulting from permutations and transpositions of alpha-3 codes listed in the ISO 3166-1 shall also be reserved as well as their translations. Allowing this may open a huge window for misuse of country specific websites. |
| Preliminary Recommendations 9 | Translations of strings (common country name) should be addressed and reserved. |
| Preliminary Recommendations 10 | Translations of strings (capital city names) should also require government support. |
| Preliminary Recommendations 11 | Since it is a city name a government support is necessary thus the text starting with “if: (a) it is ………” till the end shall be removed. |
| Preliminary Recommendations 12 | Agree with the recommendation while including translations of the string to other languages. |
| Preliminary Recommendations 13 | Agree with the recommendation |
| Proposal  3 | No. the government or public authority has the final say. The mediation could be to clarify the application more only. |
| Proposal  5 | This is very hard to implement. The actual government agency may receive the request after the deadline or the request my go the wrong government entity. Thus, stating a deadline will cause many problems and objections later. However, If implemented, sufficient time should be given! With a minimum of 9 months at least. |
| Proposal  7 | The curative mechanisms are not suitable for geographical names as well as involvements of governments.  We believe that with respect to geographical names a greater reliance on preventative mechanisms is more appropriate. |
| Proposal  8 | Agree with the proposal. |
| Proposal  9 | Agree with the proposal. |
| Proposal  10 | Since this is part of gTLDs then all gTLDs have to follow one role / policy …etc. thus, No. It should not be part of new gTLD process. |
| Proposal  11 | No. It should not be part of new gTLD process. |
| Proposal  12 | No. It should not be part of new gTLD process. |
| Proposal  13 | ISO should not be the only source however ISO codes shall continue to be reserved |
| Proposal  14 | Agree with the proposal. |
| Proposal  15 | Agree with the proposal. |
| Proposal  16 | Agree with the proposal. |
| Proposal  17 | Always require support/non-objection for capital city names. |
| Proposal  18 | Always require support/non-objection for capital city names. |
| Proposal  19  Proposal  19v1  Proposal  19v2  Proposal  19v3 | Always require support/non-objection for city names. |
| Proposal  20 | The curative mechanisms are not suitable for geographical names.  We believe that with respect to geographical names a greater reliance on preventative mechanisms is more appropriate. Therefore, keep the preventative protections for non-capital city names.  A country usually has hundreds of important cities (besides the capital). It is not practical and appropriate that the government file an objection for each city. It should be protected and granted based on letter of support or non-objection. |
| Proposal  21 | Agree with the proposal. |
| Proposal  22 | Agree with the proposal in addition to applying for TLDs in languages besides the English language. |
| Proposal  23 | Agree and include other geographical aspects other than cities for example regions, rivers, ….etc. |
| Proposal  24 | Agree and include other geographical aspects other than cities for example regions, rivers, ….etc. |
| Proposal  27 | Keep the need for support/non-objection requirements. |
| Proposal  28 | Keep the need for support/non-objection requirements. |
| Proposal  29 | Keep the need for support/non-objection requirements. |
| Proposal  30 | Keep the need for support/non-objection requirements. |
| Proposal  31 | Keep the need for support/non-objection requirements. |
| Proposal  32 | Keep the need for support/non-objection requirements. |
| Proposal  33 | Keep the need for support/non-objection requirements. |
| Proposal  35 | Agree. It should be bond. |
| Proposal  37 | Agree with the proposal. |
| Proposal 38 | Agree, and obtain the needed support/non-objection requirements. |

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