



The geoTLD.group represents the interests of 36 geographic TLDs identifying a city, region, language or culture. Our members include government entities, companies and associations. After four years of operations for our early adopters such as .berlin, geoTLDs today represent a range of TLDs, including .tokyo, .bzh, .barcelona and .sydney.

We appreciate the work of co-chairs, work track leaders and members of the new gTLD Subsequent Procedures Policy Development Process for their hard work and commitment to determine what, if any changes may be required to the existing Introduction of New Generic Top-Level Domains policy recommendations from 8 August 2007 related to geographic names.

Based on our joint experience as registry operators for geoTLDs, to minimize these issues and add greater clarity and predictability, we provide some general comments and comments specific to recommendations, questions and proposals.

Generally, the application process in 2012 went well, including for the concept of reservation of specific strings and the requirement of support/non-objection letter for certain strings. More than 60 geographic TLDs have been delegated, with the support of the respective local and/or regional government. Only a few generic applications, where the applied-for string has been identical or similar to a geographic term, caused issues.

ICANN is bound by its Articles of Incorporation and Bylaws to respect relevant principles of international law and applicable local law. As names of cities and regions are public and community resources, and national and/or local law governs their use in many countries, they require an appropriate treatment. To improve the application process from 2012, we urge ICANN to respect national legislations when it comes to geographic names and their protection.

Our specific comments are:

Preliminary Recommendation 1	We support in principle the recommendation of maintaining the reservation of certain strings at the top level and requiring applications for certain strings at the top level to be accompanied by documentation of support or non-objection from the relevant governments or public authorities. Except for the protection of non-capital city names - please refer to our answer for recommendation 11.
Preliminary Recommendation 2	We support the recommendation.
Preliminary Recommendation 3	We support the recommendation.
Preliminary Recommendation 4	We support the recommendation.
Preliminary Recommendation 5	We support the recommendation.
Preliminary Recommendation 6	We support the recommendation.
Preliminary Recommendation 7	We support the recommendation.
Preliminary Recommendation 8	We support the recommendation.
Preliminary Recommendation 9	We support the recommendation.
Preliminary Recommendation 10	We support the recommendation with the following addition (in bold): "Applications for these strings must be accompanied by documentation of support or non-objection from the relevant governments or public authorities, <b>independent from the intended use:</b> "

Preliminary Recommendation 11	<p>We do not support the recommendation. We request to amend the recommendation as follows: "An application for a string which is a representation of a city name of any country or territory according to the list at <a href="http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls">http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls</a>. An application for such a string will be subject to the geographic names requirements (i.e., will require documentation of support or non-objection from the relevant governments or public authorities) if: (a) It is clear from applicant statements within the application that the applicant will use the TLD primarily for purposes associated with the city name; or (b) The applied-for string is a city name as listed on official city documents."</p>
Preliminary Recommendation 12	<p>We support the recommendation with the following addition (in bold): "Applications for these strings must be accompanied by documentation of support or non-objection from the relevant governments or public authorities, <b>independent from the intended use</b>:"</p>
Preliminary Recommendation 13	<p>We support the recommendation with the following addition (in bold): "Applications for these strings must be accompanied by documentation of support or non-objection from the relevant governments or public authorities, <b>independent from the intended use</b>:"</p>
Question e1	<p>The rules applicable to geonames as TLDs in the 2012 Applicant Guidebook (AGB) worked generally well and struck an appropriate balance between the different stakeholders. According to our experience, the two main issues we had, referred to a) applicants for a term, which matched a geographic term and b) applicants who applied for a term which did not match, but resemble a geographic term. To minimize the problems from the last round and add to greater clarity and predictability of the application process, we made some proposals in our answers.</p>
Question e2	<p>As the geographic names panel missed quite a few geographic names during their review period including .java, we recommend the geographic names panel to use the following resources to determine a geographic name:</p> <ul style="list-style-type: none"> <li>• <a href="http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls">http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls</a></li> <li>• ISO 3166-1 for capital city names</li> <li>• ISO 3166-2 for sub-national place names, such as a county, province, or state name.</li> <li>• UNESCO Regions here: <a href="http://www.unesco.org/new/en/unesco/worldwide/">http://www.unesco.org/new/en/unesco/worldwide/</a> and "Composition of macro geographical (continental) regions, geographical sub-regions, and selected economic and other groupings" here: <a href="http://unstats.un.org/unsd/methods/m49/m49regin.htm">http://unstats.un.org/unsd/methods/m49/m49regin.htm</a>, which now redirects to: <a href="https://unstats.un.org/unsd/methodology/m49/">https://unstats.un.org/unsd/methodology/m49/</a></li> </ul>

Question e3	<p>We support preventative measures over curative measures as they add to much greater clarity and predictability: For applicants, for affected parties, for ICANNorg, and the application process and timing. Therefore, we recommend to keep and extend preventative measures including reserving certain strings to make them unavailable for delegation and requiring letters of support/non-objection from relevant governments or public authorities for all strings which are a representation of a city name of any country or territory, independent on the intended usage of the TLD.</p> <p>We do not support curative measures, as they'll force representatives of cities and regions to defend their public and community resource with tax payers money. Also, it seems that ICANN as an organization should support the global public interest.</p>
Question e4	We support the principles.
Question e5	ICANN is bound by its Articles of Incorporation and Bylaws to respect relevant principles of international law and applicable local law. To improve the application process from 2012, we urge ICANN to respect national legislations when it comes to geographic names and their protection.
Question e6	We support to "continue to reserve as unavailable translations in any language".
Question e7	We support a separate PDP in the future to be able to delegate 3-letter strings and/or other country and territory names to specific parties, but we strongly recommend not to tie the ongoing work to an outcome of future PDPs.
Question e8	We recommend keeping "An application for any string that is a representation, in any language, of the capital city name of any country or territory listed in the ISO 3166-1 standard" because the geographic meaning applies whether or not the string is the UN, official or national language.
Question e9	<p>We recommend modifying the requirement to: "An application for a string which is a representation of a city name of any country or territory according to the list at <a href="http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls">http://unstats.un.org/unsd/demographic/products/dyb/dyb2015/Table08.xls</a>. An application for such a string will be subject to the geographic names requirements (i.e., will require documentation of support or non-objection from the relevant governments or public authorities) if: (a) It is clear from applicant statements within the application that the applicant will use the TLD primarily for purposes associated with the city name; or (b) The applied-for string is a city name as listed on official city documents."</p>
Question e10	We support proposal 21, as it gives cities and regions a say, how their public resource is treated.
Question e11	In principle, we recommend that "no additional types of terms should be protected/restricted beyond those included in the 2012 Applicant Guidebook". We support to enhance to protection for "Non-ASCII geographic terms not included in the 2012 Applicant Guidebook".
Proposal 1 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We support the proposal.
Proposal 2 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We support the proposal.

Proposal 3 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We support the proposal.
Proposal 4 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We support the proposal.
Proposal 5 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We do not support the proposal as it can be gamed e.g. by contacting a person which is not responsible for issuing a support or no-objection letter.
Proposal 6 – general measures proposed to improve the New gTLD Program (see	We do not support the proposal as it conflicts with the string similarity definition.
Proposal 7 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We do not support the proposal as it conflicts with the public interest of geographic names.
Proposal 8 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We support the proposal.
Proposal 9 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	We do not support this proposal as contracts between the registry and the respective government define sufficient oversight measures.
Proposal 10 – general measures proposed to improve the New gTLD Program (see deliberations section f.1.2.5 for context)	
Proposal 11 – country and territory names (see deliberations section f.2.2.2 for context)	We do not support the proposal.
Proposal 12 – country and territory names (see deliberations section f.2.2.2 for context)	We do not support the proposal.
Proposal 13 – country and territory names (see deliberations section f.2.2.2 for context)	We do not support the proposal.
Proposal 14 – country and territory names (see deliberations section f.2.2.6 for context)	We do not support the proposal.
Proposal 15 – country and territory names (see deliberations section f.2.2.7 for context)	We support the proposal.
Proposal 16 – country and territory names (see deliberations section f.2.2.7 for context)	We support the proposal.
Proposal 17 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.1 for context)	We do not support the proposal.
Proposal 18 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.1 for context)	We do not support the proposal.
Proposal 19 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We do not support the proposal.

Proposal 19, Variant 1 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We do not support the proposal.
Proposal 19, Variant 2 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We do not support the proposal.
Proposal 19, Variant 3 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We do not support the proposal.
Proposal 20 – names requiring government support/non-objections from the 2012 AGB	We do not support the proposal.
Proposal 21 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We support the proposal.
Proposal 22 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We do not support the proposal.
Proposal 23 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We support the proposal.
Proposal 24 – names requiring government support/non-	We do not support the proposal.
Proposal 25 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We support the first part of the proposal: "Reserve non-capital city names that have "global recognition"."
Proposal 26 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.2 for context)	We support the proposal.
Proposal 27 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.3 for context)	We do not support the proposal.
Proposal 28 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.3 for context)	We do not support the proposal.
Proposal 29 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.3 for context)	We do not support the proposal.
Proposal 30 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.4 for context)	We do not support the proposal.

Proposal 31 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.4 for context)	We do not support the proposal.
Proposal 32 – names requiring government support/non-objections from the 2012 AGB (see deliberations section f.2.3.4 for context)	We do not support the proposal.
Proposal 33 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We do not support the proposal.
Proposal 34 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We support the proposal but are of the opinion, that it raises legal issues in terms of liability.
Proposal 35 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We do not support the proposal as it does not add to reliability and predictability.
Proposal 36 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We support the proposal.
Proposal 37 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We support the proposal.
Proposal 38 – terms not included in the 2012 Applicant Guidebook (see deliberations section f.2.4 for context)	We support the proposal.

We thank you for the opportunity to comment.

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Representing the geoTLD.group