



Comments from the Norwegian ccTLD Registry

We refer to the Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4) dated 3rd July 2018 and hereby submit our comments to Section 2.7.1.e.2, where Work Track 2 considers a proposal to remove the reservation of two-character strings at the top level consisting of one ASCII letter and one number:

“2.7.1.e.2: If there are no technical obstacles to the use of 2-character strings at the top level consisting of one letter and one digit (or digits more generally), should the reservation of those strings be removed? Why or why not? Do you believe that any additional analysis is needed to ensure that these types of strings will not pose harm or risk to security and stability? Please explain.”

Question 1: *“If there are no technical obstacles to the use of 2-character strings at the top level consisting of one letter and one digit, should the reservation of these strings be removed? Why or why not?”*

Even if there are no technical obstacles to the use of 2-character strings at the top level, we believe that there are reasons why the reservation should be kept.

The most important reason for keeping the reservation for gTLDs at the top level consisting of 1 letter/1digit - or the other way around - is the danger of confusion. It is for example easy to read a zero as an o and the number one as an l. Such as .RO vs. R0, .SL vs S1 etc. Opening up for this will also be in conflict with the difference between 2-character ccTLDs and 3-letters and more as gTLDs. The difference between those two groups should be maintained.

Question 2: *“Do you believe that any additional analysis is needed to ensure that these types of strings will not pose harm or risk to security and stability?”*

As stated above, we are of the opinion that it should not be opened for these types of strings. However, if the community still decides to remove the reservation and go forward with this idea, there should be conducted a careful analysis to ensure security and stability.

Kind regards,
Hilde Thunem

Managing Director
UNINETT Norid AS