

Brussels, Belgium
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CENTR comment on the GNSO proposal regarding two-character top-level domains

1. Introduction

CENTR is submitting the following comments on the proposal by the ICANN's Generic Names Supporting Organization (GNSO) for the potential future allocation of two-character strings as generic top-level domains (gTLDs) in future application rounds. On 3 July 2018 ICANN initiated a public comment period on the "Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)".

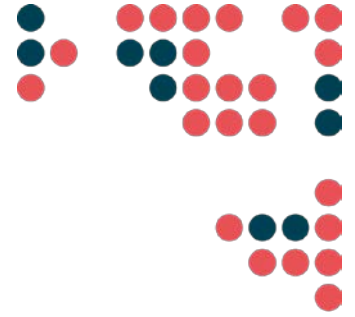
CENTR is the association of European country code top-level domain (ccTLD) registries. CENTR members believe that the GNSO's proposal to potentially allocate two-character strings at the top level, consisting of one letter and one digit (or digits more generally) can have a significant impact on ccTLDs and the stability and security of the internet's system of unique identifiers. In addition, such a proposal should be regarded with the highest level of caution and consulted with all relevant stakeholders within the internet ecosystem.

2. Areas of concern to CENTR members

The questions posed in the Annex C of the "Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)" are of most relevance to the ccTLDs (2.7.1: Reserved Names (WT2), e.2):

Question: *"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? 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."*

CENTR members insist that the reservation of 2-character strings consisting of one letter and one digit (and vice versa) should be firmly kept as it is. There would be a high risk of confusion in case if this reservation were to be lifted, due to the association between two-character top-level domains and ccTLDs (ISO 3166-1 Alpha-2). Furthermore, there is a direct threat for respective homonyms amongst possible two-character gTLDs consisting of one digit and one letter to be confused with the existing ccTLDs. This will significantly increase the number of security risks, including phishing and confusion amongst consumers. For example:



.fi -> .f1

.si -> .s1

.fo -> .f0

.sl -> .s1

.ro -> .r0

.is -> .1s

Therefore, CENTR members are calling for the highest level of caution when it comes to the proposal to introduce two-character gTLDs consisting of one letter and one digit and to ensure the stability of DNS.