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ICANN New gTLD Subsequent Procedures PDP Working Group

<https://www.icann.org/public-comments/gtld-subsequent-procedures-initial-2018-07-03-en>

COMMENTS TO NEW GTLD SUBSEQUENT PROCEDURES INITIAL REPORT, WORKTRACK 1-4

Finnish Communications Regulatory Authority (FICORA) highly appreciates the opportunity to comment on the New gTLD Subsequent Procedures Initial Report. FICORA manages the country code .fi, maintains the .fi domain name registry and system.

FICORA's particular interest concerns matters of string similarity and string confusion objections, as well as recognition of verified Top-Level Domains (TLDs) as a distinct category of TLDs.

FICORA hereby submits its 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?"

FICORA is of the strong opinion that the reservation of the 2-character strings at the top level should be kept, even if there wouldn't be any technical obstacles in preventing such.

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. For example .FI vs. F1, .RO vs. R0, .SL vs S1 etc. are confusingly similar and there is a high risk of consumer confusion in this regard.

Opening up for the 2-character strings at the top level 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 for the sake of clarity.

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, FICORA is of the strong opinion that it should not be opened for these types of strings for the sake of clarity of internet users. 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.

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