26-SEP-2018

Dear ICANN,

We would like to submit our comments on the "Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)".

We call your attention to our full support for APTLD72 Statement on Country and Territory designators as Top-level Domains, dated 18 September 2017. See:
https://aptld.org/documents/Others/201711/APTLD%2072%20Communique%20and%20Statement.pdf

Hence, we definitely stand up for the continuation of the status-quo regarding country and territory designators as top-level domains, i.e.:

- All 2-letter ASCII codes, whether or not in the ISO 3166 alpha-2 list, are reserved for ccTLDs,
- All 3-letter ASCII codes in the ISO 3166 alpha-3 list are reserved and cannot be applied for, and
- Any string in the ICANN's Reserved Country and Territory Names lists would not be delegated as a gTLD.

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 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 (https://en.wikipedia.org/wiki/Country_code_top-level_domain).

Sincerely Yours,
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Director of SaudiNIC