



September 26, 2018
NIC-CR-382-1-2018

New gTLD Subsequent Procedures Policy Development Process Working Group
ICANN

To Whom It May Concern,

Regarding the Initial Report of the New gTLD Subsequent Procedures Policy Development Process (PDP) Working Group (Work Track 1-4), NIC Costa Rica, ccTLD operator for .cr, has the following comments:

The Initial Report states: “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.”

NIC Costa Rica believes that the technical questions asked regarding the technical obstacles to use of 2-character strings at the top level need to be addressed and answered by DNS Technical Experts, such as the Security and Stability Advisory Committee (SSAC).

Moreover, the reservation of the use of 2-character strings at the top level consisting of one letter and one digit **should NOT be removed**. Two-character top-level domains are firmly associated with country-code Top Level domains; ccTLDs are created by IANA/PTI from two-character codes laid down in ISO 3166-1.

Furthermore, there are homographic issues which pose a direct threat to the security and stability of the Internet’s system of unique identifiers, including ccTLDs such as the following:

.cl	->	.cl
.co	->	.c0
.do	->	.d0
.ni	->	.n1





With sans-serif typefaces, there is considerable risk for consumer confusion and consequent security risks, including phishing attacks.

ICANN's core mission is to *"...to coordinate the stable operation of the Internet's unique identifier systems."* The introduction of homographic-conflicted two-character top-level domains would be in direct conflict with that core mission.

In conclusion, NIC Costa Rica strongly opposes to the release of 2-character strings at the top level consisting of one letter and one digit due to the technical, security and confusion issues described above.

Best regards,

A handwritten signature in black ink that reads "Rosalía Morales".

Rosalía Morales
NIC Costa Rica
Executive Director

