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Subject: Comment on the GNSO proposal regarding two-character top-level domains

ICANN's Generic Names Supporting Organization (GNSO) presented Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4) (hereinafter: "**report**"), which is currently under public review. Annex C of the report refers to the potential allocation of two-character strings as generic top-level domains (gTLDs) in future application rounds. The question, most relevant to us as a country code top-level domain (ccTLD) registry, posed by the GNSO is:

"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 risks to security and stability? Please explain."

As a registry for .si top-level domain name we believe that the reservation of 2-character strings consisting of one letter and one digit (and vice versa) should remain unchanged, even barring any technical obstacles. The suggestion, as proposed in said Annex C of the report, pose a serious threat to stability and security of Slovenian ccTLD. Should the restrictions be relaxed, the confusion amongst consumers as well as opportunities for phishing and other abuses could multiply. For example it is easy to confuse digit "1" with letter "i" and therefore ".s1" with ".si".

We do not believe that additional analysis is needed as the risk to security of and stability of DNS greatly outweighs any benefits.


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