

## Afnic comment on New gTLD subsequent Procedures Initial Report

Afnic is the registry operator for top-level domains corresponding to the national territory of France (.fr, .re, .pm, .yt, .wf, .tf) and the backend registry operator for 14 new generic Top Level Domains. Afnic is a member of CCNSO, Centr, and APTLD.

We welcome this opportunity to provide our inputs on the questions raised by the initial report on the New Subsequent Procedures PDP Work Track 1 to 4.

**Question 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, should the reservation of these strings be removed? Why or why not?”*

We would like to draw the community’s attention on the fact that even 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 one digit and one letter), there are substantial reasons why the reservation should be kept.

The most important reason being **the risks of confusion** due to the association between two-character top-level domains and ccTLDs (ISO 3166-1 Alpha-2).

We believe that the possible confusion between homonyms amongst two-character gTLDs consisting of one digit and one letter and the existing ccTLDs will significantly increase the number of security risks, including phishing and confusion for consumers. For example, it is easy to read a zero (0) as an o and the number 1 as an l:

.fi → .f1

.si → .s1

.fo → .f0

.sl → .s1

.ro → .r0

.is → .1s



**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, we are calling on the highest level of caution on that proposal as we remain convinced that, in order to ensure DNS stability, these types of strings should not be introduced for gTLDs.

Would the community wish to go forward with the use of two-character strings for gTLDs consisting of one letter and one digit, a careful analysis on security and stability will have to be conducted before any decision.

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