

## SIDN's response to the question on 2 character 1-letter, 1-number strings

SIDN is the manager of the .nl domain, with a total of more than 5.8 million registered domains in numbers the ninth TLD in the world.

SIDN took note of the following question in the Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4):

2.7.1: Reserved Names (WT2)	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 (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.
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As is already recognized in the report (footnote 271) all combinations with numbers 1 and 0 are problematic as they will in many fonts not be clearly distinguished from the letters l or (capital) I and o. Opening up the possibility to register such domains will lead to confusion for end users and a huge amount of willful and often fraudulent attempts to mislead the public by impersonating domains under ccTLD's with those letters in the name of their TLD. SIDN therefore strongly opposes the suggestion to opening up these harmful possibilities.

SIDN further opposes the use of 2-character codes for gTLD's entirely. There is a historical difference between ccTLD's and gTLD's in the way they are governed and the distinction between them has always been very easily clearly visible. 2-character codes are ccTLD's others are g's. We shouldn't mix this up and confuse the public.

Arnhem, 25 September 2018

SIDN

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