

Registries Stakeholder Group Statement

Issue: **Proposed implementation of GNSO Consensus Policy Recommendations for the Protection of IGO & INGO Identifiers in All gTLDs**

Date statement submitted: **9 July , 2017**

Reference URL: <https://www.icann.org/public-comments/igo-ingo-protection-2017-05-17-en>

Background

The document describes the proposed implementation of consensus policy recommendations governing the Protection of certain specific names of the Red Cross/Red Crescent Movement (RCRC); the International Olympic Committee (IOC); certain IGOs and INGOs; [not the Red Cross or IGO acronyms].

RySG Comment

The Registries Stakeholder Group (RySG) appreciates the opportunity to comment on the Proposed implementation of GNSO Consensus Policy Recommendations for the Protection of IGO & INGO Identifiers in All gTLDs. We would like to make the following comments.

1. The Policy defines the term “INGO Claims System” as “*a database of DNS labels corresponding to the INGO Identifier List*” (Section 3.4, Definitions). This term is also used in the context of Section 5.2.7 (INGO Claims Service): “*Upon Registration, the Registry Operator MUST provide a notification in the INGO Claims System that the name in the INGO Claims System has been registered [...]*”.

From these two sections we conclude that the Registry Operator will need some kind of integration to communicate with the INGO Claims System.

- a. We note that the INGO Claims Notice (Appendix A) is different from the TMCH Claims Notice. In this context, does this mean that the INGO Claims System is different from the TMCH Claims System as defined in Section 3 of the Trademark Clearinghouse Rights Protection Mechanism Requirements? If such is the case, what is the rationale why the INGO Claims Notification cannot leverage TMCH? We would expect that using an existing system would be more efficient than integrating with a new one.
- b. How do the Registry Operators’ and registrars’ obligations under this policy dovetail with the New gTLD Registry Agreement Section 2.6, Spec 5, and the RPMs for new gTLDs (e.g., are the reserved labels under this policy subject to Sunrise and/or Claims Services upon release, a la Section 2.4.3 of the RPMs)?

2. Section 4.1 (Reservation) of the Policy, states that *“All gTLD Registry Operators MUST either withhold from registration or allocate to Registry Operator the second-level domain names corresponding to the DNS Label(s) [...]”*.

- a. We recommend that the Policy makes it explicit what registrar account Id the Registry Operator can use to allocate the domain names under this Policy. We suggest that it should be the Registry Operator Non-Billable account, or Gurid 9999.
- b. What does “unless otherwise specified” mean in the context of Section 4.1? If this refers to the exception specified in Section 4.2, then we recommend making the statement specific.

3. We recommend the following addition to Section 4.2: *“Existing Registration in gTLDs: If a domain name, containing an exact match name from the Red Cross, IOC, and IGO Identifier List, is registered before the label is added to the Red Cross, IOC and IGO Identifier List, the Registry Operator MUST permit renewal or transfer of the domain name, **subject to applicable Registry Operator’s policies and restrictions.** [...]”*

4. Section 4.3 (Registration by Red Cross, IOC and IGO Organizations) requires Registry Operators *“to provide a method for registration of the reserved names by Red Cross, IOC and IGO organizations”*.

- a. Registry Operators will not be able to guarantee that an applied-for domain name will be available for registration, therefore we recommend additional language in footnote “2” to read: *“Registrations in the TLD remain subject **to availability and** to Registry Operator’s **applicable registry policies and** registration restrictions, including community-based eligibility requirements, Public Interest Commitments **and IDN Tables**”*.
- b. We highly recommend making it explicit that Registry Operators do not have the obligation to validate eligibility of the potential registrant or any related liability.
- c. The potential Registrant must use an ICANN accredited registrar. The registrar or a third party needs to validate eligibility of the potential registrant.

5. Section 4.4 (Red Cross, IOC and IGO Identifier List Changes) states that ICANN will notify Registry Operators of any change in the list.

- a. We recommend ICANN to make the list available through a machine-readable file that Registry Operators can process.
- b. Ten calendar days may not be adequate time for Registry Operators to process changes or updates of the list.
- c. To expedite the process of any changes to the list, we recommend that the notification to Registry Operators is broken down into at least two parts or that its data fields denote: i) DNS labels added to the list; ii) DNS labels removed from the list. And to be clear, DNS Labels for IDNs should be in its ASCII Compatible Encoding form.
- d. The list of names enclosed in the notification MUST be in machine-readable format, exact matches only.

6. Section 5.3 (INGO Identifier List Changes).

- a. The comments made on Section 4.4 (see above) also apply on Section 5.3.

7. DNS Label Conversion rules.

- a. We generally support the conversion rules as explained in section 1.1. However, we want to raise that a valid U-Label or A-Label will be subject to Registry Operator's IDN Table rules, which may make the DNS Label ineligible for registration in that specific TLD. For example, a Cyrillic DNS Label will be ineligible for registration in a TLD that does not support Cyrillic domain names at the second level, or a DNS Label may be ineligible for registration because the Registry's TLD IDN Table does not support a certain code point or code point sequence in the DNS Label.
- b. In cases of IDN variants, each IDN variant should be listed as a single entry in each one of the Identifier Lists.
- c. In all cases, the DNS Labels should be in machine-readable format.

8. Policy implementation date (1 February 2018).

- a. An implementation date of 1 February 2018 may not provide proper time for Registry Operators to prepare for new processes or integration with the INGO Claims System. However, the preferred approach is to leverage TMCH for Claims Services. Therefore, we recommend setting an implementation no earlier than 12 months from the approval of the specifications.
