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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Use of Country and Territory Names as Top-Level Domains

Introduction

Maureen Hilyard, ALAC member of the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO), with the assistance from Cheryl Langdon-Orr, member of APRALO, developed an initial draft of the ALAC Statement.

On 28 September 2015, the first draft of the Statement was posted on the [At-Large Use of Country and Territory Names as Top-Level Domains Workspace](#).

On that same day, Alan Greenberg, Chair of the ALAC, requested ICANN Policy Staff in support of the ALAC to send a Call for Comments on the Statement to all At-Large members via the [ALAC-Announce Mailing List](#).

On 07 October 2015, a version incorporating the comments received was posted on the aforementioned workspace.

During the [ALAC & Regional Leadership Wrap-Up Session on 22 October 2015](#) during the ICANN 54 Meeting, an ALAC ratification vote was conducted on the proposed Statement. Staff confirmed that the vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 vote against, and 1 abstention. You may view the result independently under: <https://community.icann.org/x/XKc0Aw>.

ALAC Statement on the Use of Country and Territory Names as Top-Level Domains

In putting this statement together, the ALAC appreciates the contributions that have been made by members of the At-Large Community. The statement reflects the many viewpoints that arose out of the consultation and discussions.

Consensus within the community was that all 3-character TLDs should not be reserved solely for ccTLDs but there was a split as to whether there was any merit in reserving 3-letter codes for use by ccTLDs at all.

If 3 letter codes were to be used for country codes, the same standard that was applied to the 2-letter codes should also be applied to 3-letter codes as in the ISO 3166-1 list. ISO alpha-3 codes could be reserved as an alternative standard for country and territory codes in the same way that other standards have been reserved, such as ISO 4217 for currencies and ISO 639 for languages. This would open up the rest of the 3-letter options as gTLDs.

An advantage of such a policy would be for ccTLD operators to have 3 character ccTLDs that may be marketed as complementary to two character ccTLDs. Reserving all 3-letter ccTLDs would allow for future changes to the ISO 3166 alpha-3 to be reflected on the countries and territories being designated with new codes. The disadvantage of such a policy is that it blocks future 3-letter ccTLDs for use as possible gTLDs. There is also a risk of end-user confusion as to what policies would apply to the different TLDs. gTLD registries have contracts with ICANN which stipulate certain conditions that must be met (RAA, WHOIS, PICs, etc) and enforce such policies via contractual compliance; ccTLDs don't have any such contracts with ICANN and can implement any policy as the ccTLD administrator wants.

As an alternative, 3-letter codes listed as ccTLDs in ISO 3166-1 could be made available as gTLDs as long as they did not conflict with existing alpha-3 codes from the ISO 3166-1 list or were not marketed or used as pseudo-ccs. Policing or enforcing this could be problematic. It was also noted that the ISO 3166 alpha-3 (and alpha-2 for that matter) codes themselves are not static documents, as they are updated to reflect changes to countries and territories. Hence, there is a risk that a new country or territory can be allocated a new 3-letter code that could be taken by a gTLD. This would give rise to newer countries and territories being treated differently from existing countries. A new country or territory could be "locked out" of the use of its 3 character code, whilst older counties retained the use of theirs. If such governments or public authorities feel they are better recognized or identified by three character codes already in the ISO 3166-1 alpha-3, such entities could file objections to their use as gTLDs via their GAC representatives or apply to the 3166-MA which assigns country code elements. Consultation with the relevant government/public authority would be prudent.

There are already examples where 3-letter country codes are currently being used as gTLDs by other organisations (eg .com, as COM is the ISO 3166-1 alpha 3 code for Comoros). Current exceptions to the reservation standard did not invalidate the standard moving forward but there must be caution in creating exceptions which could diminish trust in ICANN and subsequently trust in the stability of the DNS.

There was an opposing view that there is no merit in reserving 3-letter codes due to several reasons. First, current 3-letter country codes are not widely used and some organisations are already using country codes other than the ISO ones. The IOC (International Olympic Committee) and the FIFA (Fédération Internationale de Football Association) use other codes. For example, the ISO code for South Africa is ZAF while IOC and FIFA use RSA; whereas the ISO and FIFA code for Barbados is BRB, IOC uses BAR. Thus if ISO 3166-1 codes were reserved, would one need to reserve IOC & FIFA codes too? Second, as every geographical area has a 2-letter country code

and there are plenty of 2-letter codes remaining, countries may not need to use their assigned 3-letter code as well. The call by the opposing group was to open the 3-letter codes to all, and to maintain the 2-letter codes for ccTLDs.

While some 3-letter country codes are easily identifiable as referring to specific countries and territories, there are still other country codes that would also be very desirable as 3-letter gTLDs. A reserved list would restrict access to good codes for gTLDs, especially when they were unlikely ever to be used as ccTLDs.

The ISO 3166-1 alpha-3 list does not use IDN characters and it is not clear if a definitive list of 3 character IDN strings exists that could be used to represent countries and territories. Blocking all 3 IDN characters would likely delay the expansion of IDN gTLDs. If there are 3 character IDN strings that represent a geographic name (the name of a country, territory, or state names as in the current Applicant Guidebook), then such strings should be rejected as gTLDs as per the Applicant Guidebook. As ICANN has decided that IDN ccTLDs will be delegated to the same registries as hold their existing ccTLDs, it is recommended that this precedent should be referred to when the delegation of alpha-3 codes arises.

There were opposing views as to the appropriateness of either the GNSO or the ccNSO as the manager of the 3-letter country/territory codes. Some resistance was expressed with regards to the GNSO taking charge of Alpha-3 codes in competition with Alpha-2 codes run by the ccNSO.

With regards to the many arguments for and against the reservation of 3-letter ccTLDs with the potential for creating much confusion amongst the user community, there was very strong agreement among the At-Large respondents that there is a need for a moratorium where a full evaluation should be made of the potential impacts of the current expansion of the existing new gTLD programme. It has also been recommended, in order to increase user confidence in navigating the enlarged domain space, that along with a time-framed moratorium, promotional and educational resources and activities related to the introduction of the new gTLDs be developed in areas (geographical, political, social, economic, etc) that were not served well in the first run.