# Community Responses on 3-character TLD questionnaire

Staff Summary and Overview v1.1 (15 December 2015) [1]

**Introductory Comment**

The remit of the CWG-UCTN is to develop a policy framework for the use of country and territory names as top-level domains. Staff notes that any such framework ought to rely on key principles, such as consistency, transparency, ease of understanding and use, as well as effectiveness.

**General observations**

- There were some misunderstandings about questions and purpose of questionnaire but this did not impact the understanding of the respondents' general viewpoints.
- The responses can be categorized into three general camps:
    1. No more future 3-characters gTLDs, only 3-character ccTLDs based on ISO-3166-2.
    2. Maintain the status quo.
    3. Open all top-level 3-character codes, including ISO-3166 list, as gTLDs.
- gTLD stakeholders unanimously favored option three (of the list above), ccTLD providers – including GAC members – are spilt between all three.

**Suggested to-dos for the CWG-UCTN**

- How to develop an underlying set of principles for building a coherent and country and territory names as top-level domains policy framework?
- One starting point might be to define, for the purpose and remit of this Group, key terms such as
    o User confusion
    o Government non-objection
    o 'ownership' of 2- and 3-character codes of the ISO (and other) list(s)
- Discuss government/country 'rights' to codes v. private entities' 'rights': .fra = France; .fra = Frankfurt Airport – what legal basis is there for either (or neither) to 'claim' the code for use as a TLD?
- Are there any components from the draft recommendation on 2-character codes, and its accompanying reasoning and principles, on which those for 3-character codes could be built?

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[1] This summary is based on the submissions made by ICANN stakeholders and submitted to the CWG-UCTN in response to its questionnaire. This summary is not authoritative and readers are strongly encouraged to also consult the full-length submissions available on the CWG-UCTN Wiki [https://community.icann.org/x/4xXxAg].

## Viewpoints provided by community feedback on 3-character codes[2]
*Listed in no particular order*


**Supporting to open all 3-character codes as gTLDs.**
- There is no government sovereignty or recognized legal ownership of ISO list – and so there cannot be a government veto power on allocation as gTLDs.
- RFC-1591 – on which the allocation of 2-character codes as ccTLDs is based – does not refer to 3-letter codes, so there is no precedent of basis for 3-character codes to be as ccTLDs.
- Precedent of .com
- gTLD space was built initially on 3-character codes
- Banning 3 character codes would have impact on e-commerce and consumer choice
- Adding ISO-3 list as ccTLDs would blur the line between ccTLDs (so far exclusively 2 letters and gTLDs (so far 3 letters and more).


**Supporting the status quo**
- Ensures governments can protect 'their country's' ISO code.
- Avoid user confusion of which TLD represents a country and which is generic; i.e. if .no is a ccTLD and .nor is a gTLD.
- Allocation of 3-character codes to ccTLDs might lead to cannibalization of the 2-character ccTLDs.
- Interest of a country's ccTLD provider and its government (in case of non-objection requirement) are not always aligned.


**Supporting extension of ccTLDs to 3-letter ISO lists**
- Providing new business streams for ccTLD providers, especially smaller ones or those that have so far run 'their' ccTLD as an effective gTLD.
- There are other reference lists for country codes - they should/could be taken into consideration when protecting governments and countries.
- Protection of ccTLDs, especially smaller ones, in a continuously growing TLD market, in which gTLDs have an almost unlimited choice of options to offer registrants.


**Outlier positions**
- 3-character codes should not be allocated at all in future rounds - not as ccTLDs nor as gTLDs.

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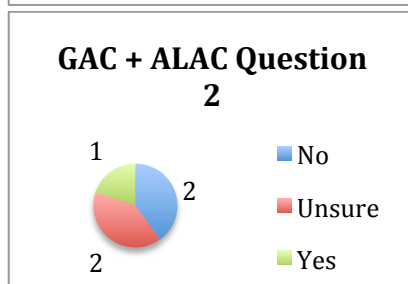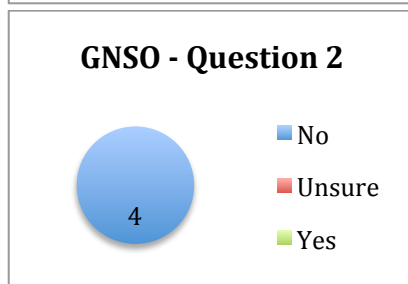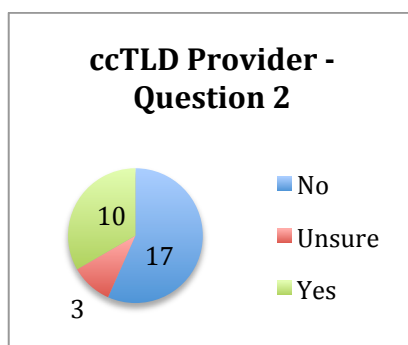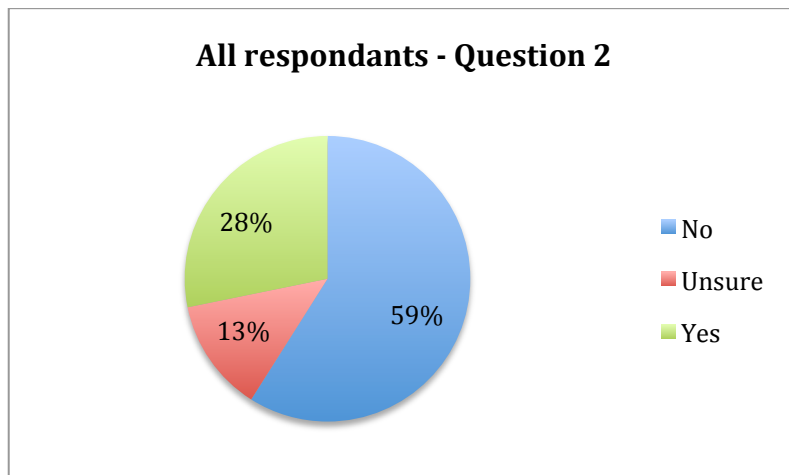**Graphics representing broad viewpoints on 3-characater questionnaires**
Total Responses: 39[3]

**Question 1:** In future, should all three-character top-level domains be reserved as ccTLDs only and be ineligible for use as gTLDs? What would be the advantage or disadvantage of such a policy?
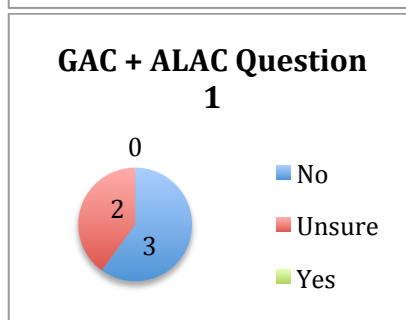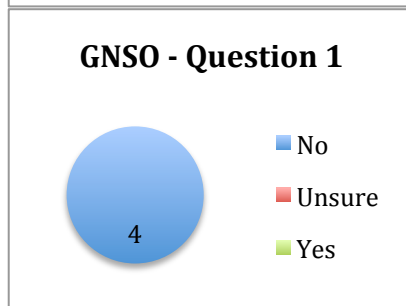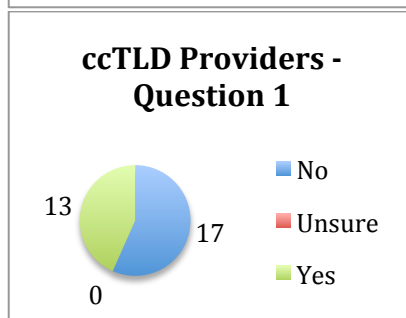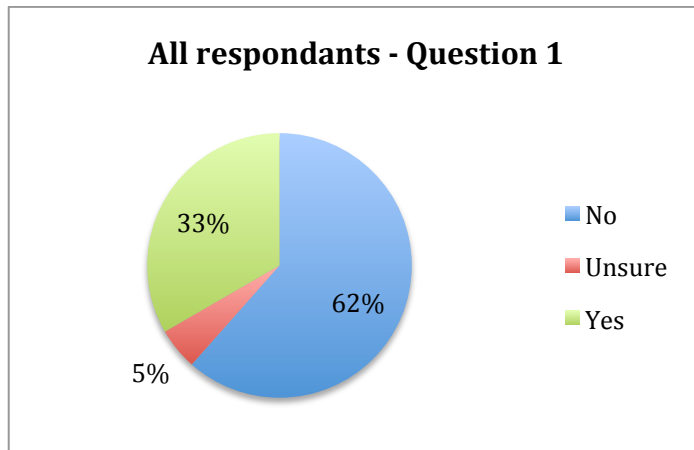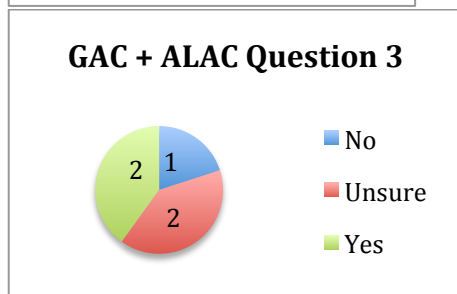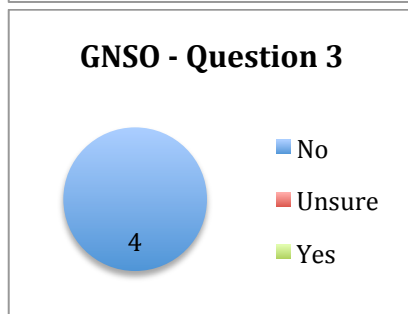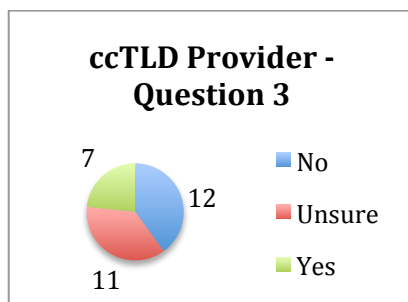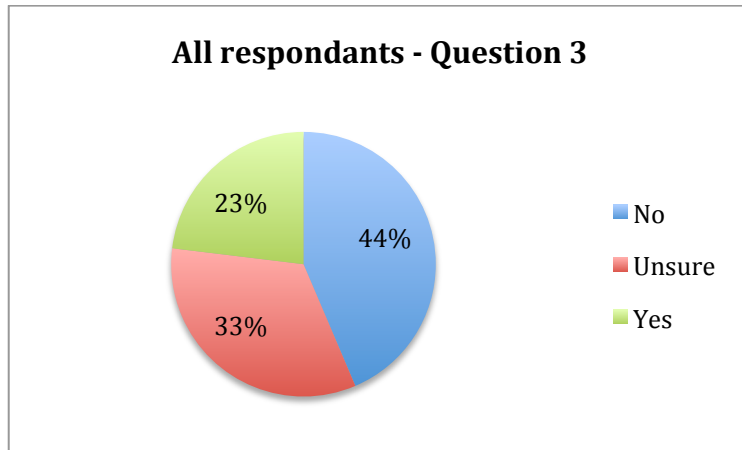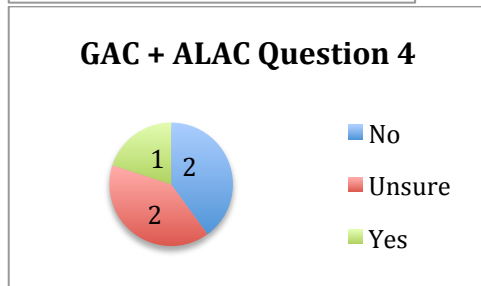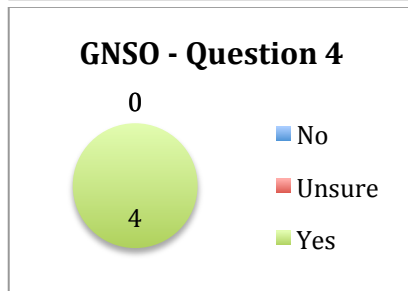
[3] ccTLD: 30; GNSO: 4; GAC/ALAC: 5

**Question 2:** In future, should all three-character top-level domains be eligible for use as gTLDs as long as they are not in conflict with the existing alpha-3 codes from the ISO 3166-1 list; i.e. the three-character version of the same ISO list that is the basis for current ccTLD allocation? What would be the advantage or disadvantage of such a policy?

**All respondants - Question 2**

28%

13%

59%

- No
- Unsure
- Yes

**ccTLD Provider - Question 2**

10

17

3

- No
- Unsure
- Yes

**GNSO - Question 2**

4

- No
- Unsure
- Yes

**GAC + ALAC Question 2**

1

2

2

- No
- Unsure
- Yes

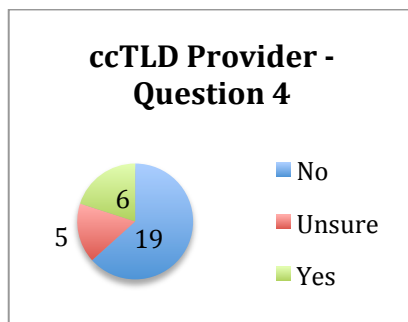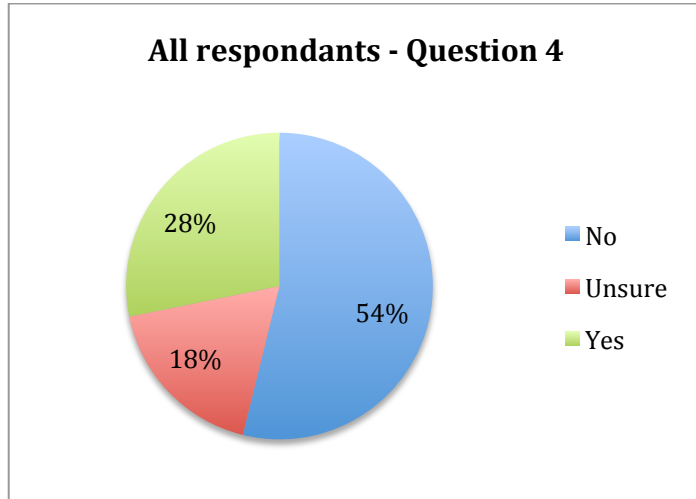**Question 3:** In future, should three-character strings be eligible for use as gTLDs if they are not in conflict with existing alpha-3 codes form the ISO 3166-1 list and they have received documentation of support or non-objection from the relevant government or public authority? What would be the advantage or disadvantage of such a policy?

### All respondants - Question 3



- No 44%
- Unsure 33%
- Yes 23%

### ccTLD Provider - Question 3



- No 12
- Unsure 11
- Yes 7

### GNSO - Question 3



- No 4
- Unsure
- Yes

### GAC + ALAC Question 3



- No 1
- Unsure 2
- Yes 2

**Question 4:** In future, should there be unrestricted use of three-character strings as gTLDs if they are not conflicting with any applicable string similarity rules? What would be the advantage or disadvantage of such a policy?

**All respondants - Question 4**

28%

54%

18%

- No
- Unsure
- Yes

**ccTLD Provider - Question 4**

6

5

19

- No
- Unsure
- Yes

**GNSO - Question 4**

0

4

- No
- Unsure
- Yes

**GAC + ALAC Question 4**

1

2

2

- No
- Unsure
- Yes

**Question 5:** In future, should all IDN three-character strings be reserved exclusively as ccTLDs and be ineligible as IDN gTLDs? What would be the advantage or disadvantage of such a policy?
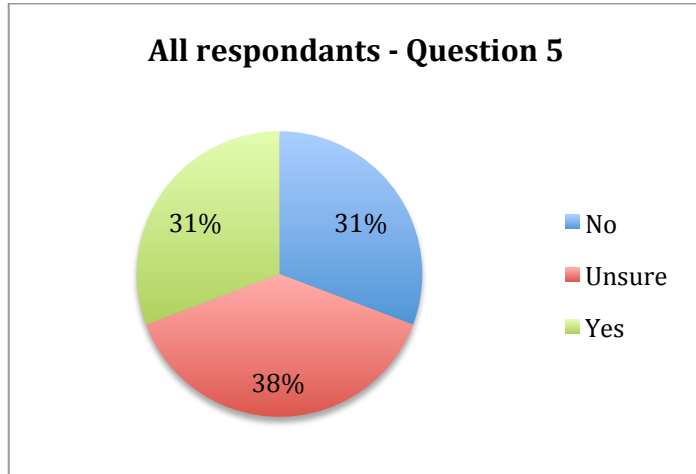
**All respondants - Question 5**



- No
- Unsure
- Yes

**ccTLD Provider - Question 5**



- No
- Unsure
- Yes

**GNSO - Question 5**



- No
- Unsure
- Yes

**GAC + ALAC Question 5**



- No
- Unsure
- Yes
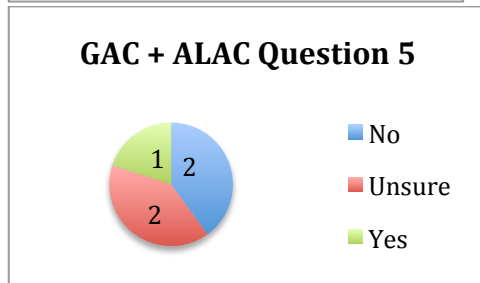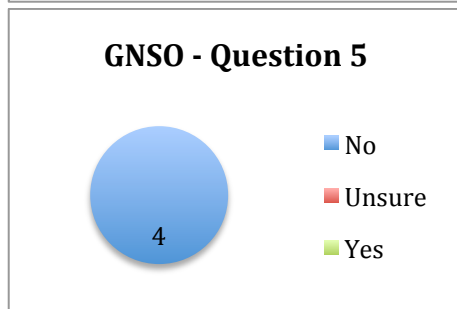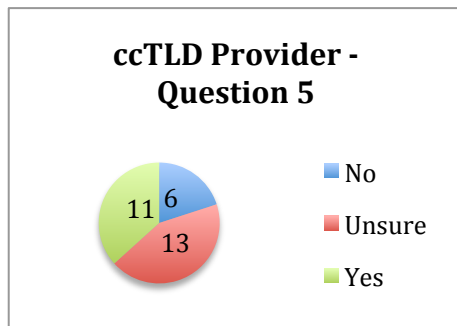
**Question 6:** In future, should there be unrestricted use of IDN three-character strings if they are not in conflict with existing TLDs or any applicable string similarity rules? What would be the advantage or disadvantage of such a policy?

**All respondants - Question 6**

| | |
|---|---|
| 31% | |
| 51% | ■ No |
| 18% | ■ Unsure |
| | ■ Yes |

**ccTLD Provider - Question 6**

6
5
19
■ No
■ Unsure
■ Yes

**GNSO - Question 6**

0
4
■ No
■ Unsure
■ Yes

**GAC + ALAC Question 6**

2
1
2
■ No
■ Unsure
■ Yes