**Cross Community Working Group on the Use of Country and Territory Names as top-level domains**

Overview of Responses on 3-character codes – Question 1-4 (as of 15 December 2015)

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|  | *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?* | *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?* | *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?* | *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?* |
| **Registry Stakeholder Group** | No. There is no basis under international law for all 3-character codes to be reserved for use only as ccTLDs and ineligible as gTLDs. Countries and country-code operators have no valid claim to sovereignty or ownership rights over 3-character codes. Whilst the RFC-1591 *Domain Name System Structure and Delegation* of March 1994 is considered by some to provide a basis and historical justification for the continued reservation of 2-character codes for use as ccTLDs, it provides no such basis for reserving 3-character codes. Furthermore, we understand that it has been suggested by some that to allow 3-character codes to be used as gTLDs gives rise to a risk of confusion with the ccTLDs. This argument is unsupportable. There is no precedent for 3-character codes to be reserved as ccTLDs and ineligible for use as gTLDs. Quite the reverse, in fact.  The RFC-1591 identified seven 3-letter gTLDs, and thus from at least as early as 1984 users of the internet have learned to recognise 3-character codes as such, and not as ccTLDs. Since that time, and particularly now as a result of the first round of new gTLDs, there are numerous examples of 3-character strings which have already been allocated as gTLDs. These include those legacy gTLDs including .com, .net, .org, and new gTLDs, including .app, .bbc, .bio, .cab, .cfd, .fox, .nyc, .rio. Whilst the numbers of three-character strings already allocated are too numerous to list in full, it can be seen from this small snapshot that they include a range of gTLD types: brands, cities, open restricted, and open generic registries. If confusion were to occur, it would be by reserving 3-character codes for use as ccTLDs, when the public recognise these strings as being gTLDs, and ccTLDs as being 2-letter codes. | We refer to our response to question 1. All 3-character codes should be eligible for use as gTLDs, regardless of whether they are listed as alpha-3 codes from the ISO 3166-1 list. It should be noted that “COM” is included on that list and thus there is precedent for such 3-letter codes to be allocated as gTLDs. It would only be acceptable to reserve alpha-3 codes where the use of these codes is restricted as a matter of international law. This is not the case: the ISO 3166 list is simply a standard and has no basis in international intellectual property or otherwise as establishing or confirming ownership rights or in prohibiting use. | No. See responses for questions 1 and 2. Governments and public bodies have no sovereignty over these terms and should not be seeking to have control or veto over their use. | Yes, we consider that this would be the most appropriate approach for the future, except in cases where international law, or some other agreed-upon restriction (such as that on the use of “www”) dictates otherwise. This would have the advantages of removing a restriction which lacks any basis in international law and making such strings available for registration by any applicant in a new gTLD round. |
| **Brian Winterfeldt, Griffin Barnett** | This would prevent any future applications for three-character combinations as gTLDs. We oppose this option. | This would prevent any applications for three-character combinations as gTLDs that match any alpha-3 codes, reflecting the current status quo. Alpha-3 codes have never been used as active TLDs by any country or territory, even though they have been assigned. There is no legal basis for government ownership, control, or priority over these names. We oppose this option. | This would prevent any applications for three-character combinations as gTLDs that match any alpha-3 codes, without the relevant government’s consent. There is no legal basis for requiring such consent, and no legal basis for government ownership, control, or priority over these names. Alpha-3 codes have never been used as active TLDs by any country or territory, even though they have been assigned. We oppose this option. | This would permit any gTLD applications so long as the string were not confusingly similar to another previously-delegated or applied-for string. This is the most logical and legally-sound option. We support this option. |
| **GAC – Afghanistan**  | It only creates confusion between users for ccTLDs and gTLDs.ccTLD is driven by local law where the gTLD is driven by thr global law, this itself is a big confusion for users. If in the future there were any plan then it would be feasible to have 3 letters strings only for use in ccTLDs.A good example in our case is **AFG** which is the abbreviation for **Afg**hanistan but there are various companies like **A**merican **F**inancial **G**roup in USA, **A**ustralian **F**inancial **G**roup in Australia, **A**l **F**uttaim **G**roup in UAE, **A**dvent **F**ilm **G**roup that use the same abbreviation for their brand names, this would create serious issues between the government and private sector.Advantage is that there will be more sells for gTLDs and some brands might get their 3 letters TLD.Disadvantage is that it creates confusion for users | No, the use of 3 characters strings as gTLDs must receive no objection letter from the governments and other public authorities first.Advantage is: they will have open hand to register any string for their brads no matter it is in conflict with the ccTLD.Disadvantage is that governments and other public authorities will have no knowledge of the strings being registered for their businesses. | As long as it is not in conflict with existing alpha 3 codes from ISO 3166-1 list, they are good to proceed.The only advantage is that there will be consultation and no objection letter needed from the government that gives the government and other public authority to closely review the stringDisadvantage would be the same (Confusion for users) | No, the use of 3 characters strings as gTLDs must receive no objection letter from the governments and other public authorities first.Advantage is: they will have open hand to register any string for their brads no matter it is in conflict with the ccTLD.Disadvantage is that governments and other public authorities will have no knowledge of the strings being registered for their businesses. |
| **GAC – Norway**  | The question is not asked correctly. We don’t think 3-letter country codes should be used at all (unless for some instances of IDN ccTLDs and gTLDs. See answers below on Q5). They should not be reserved for ccTLDs neither should they be used for gTLDs. The reason for this is the 3-letter country code represent the same country or territory as the 2-letter country code. Therefore, using these 3-letter codes at allcould create end user confusion. Using the 3-letter country codes for ccTLDs could be a confusion for the end user since the 3-letter country codes has so strong association to the country and could therefore by the end user be mixed up with the existing ccTLD. | No. Certain 3-letter codes have already been used for gTLDs and there are actually some instances of them being on the 3-letter country code list. To use more 3-letter codes for new gTLDs will increase the risk for end user confusion, so our suggestion is to not use any new three letter code at all for new neither ccTLDs nor gTLDs. | No, the 3-letter codes should not be used at all. Again, end user confusion. | No. As stated before. We do not think it is a good idea to use more 3-letter codes for any new top level domains. |
| **Intellectual Property Constituency** | **Three-character top-level domains should be eligible for use as gTLDs and should not be reserved as potential ccTLDs.** The IPC acknowledges the work of the CWG-UCTN to date and notes its findings in relation to RFC1591 and the historical, standardized practice relating to the use in the DNS of ISO 3166 alpha-2 2-letter codes arising from the adoption of that standard in the design of the DNS. There is no such practice in the DNS in relation to 3-letter codes. Further, ISO 3166-1 alpha-3 codes are three-letter country codes defined in ISO 3166-1, part of the ISO 3166 standard published by the International Organization for Standardization (ISO), to represent countries, dependent territories, and special areas of geographical interest based upon the alpha-2 codes (there is a third set of codes, which is numeric and hence offers no visual association). As such, the countries and geographic interests represented thereby are wholly represented in ISO 3166 alpha-2. In other words, reservation of 3 letter codes would be completely duplicative, redundant and serve no apparent purpose. Further, no perceived advantage or necessity has been identified by the technical or country code community for such an expansion, and the IPC has been unable to identify any advantage of such a policy.  In contrast, there are extremely significant disadvantages to such a policy. The gTLD space has historically been built on three-character codes, such as .com, .net, and .org, and there is a high degree of consumer comfort and technical comfort with three-character gTLDs. This can be seen in the new gTLDs as well; for example, there were several applications for .web and .app, and a significant number of other applications new gTLDs adopted the traditional three-letter format. Such an expansion would (i) remove all three-letter words and acronyms from consideration as gTLDs (as well as all other three-character combinations), (ii) be impractical and effectively extinguish rights in existing 3-letter gTLDs, and (iii) would significantly impinge upon well-established, internationally-recognized private rights without justification, and (iv) remove other opportunities for appropriate and important gTLDs (e.g., .CAT).More specifically, placing restrictions on 3-character strings effectively results in the exclusion of over 17,000 potential new gTLDs from the DNS, many of which are commonly used words or famous or well-known trademarks. This is inconsistent with many of these countries'/states' own trademark laws and is a significant impediment to the ability of rights holders worldwide to participate in the DNS and engage in e-commerce.The IPC is opposed to the reservation of all 3-character TLDs as potential ccTLDs. | **All three-character top-level domains should be eligible for use as gTLDs regardless of whether they are “in conflict with” the existing alpha-3 codes from the ISO 3166-1 list.** As explained in its response to Question 1, there is no existing, standardized practice in the DNS of using 3-letter codes to represent countries and territories. In fact, there is no such practice at all. The purpose of protecting countries and geographic interests is completely achieved by the reservation of the two letter codes contained in ISO 3166 alpha-2. There would be a vast increase in blocked names and words by increasing the prohibition from two letters to three, the IPC is greatly concerned over the impact that such a policy would have on the robust growth of the gTLD space, property rights, free speech and openness. No compelling and legally or technically justified reason for such an exclusionary policy has been articulated. | **There should be no “support/non-objection” process for governments and public authorities.** As the IPC has highlighted in its previous comments in relation to geographic domain name policy, there is no basis in international law for a support or non-objection requirement. Such a requirement is *de facto* a veto. This introduces significant uncertainty for applicants, in direct contrast to the goals of top-level expansion. Such a process also implies that governments and public authorities have a legal or sovereign right to “their” ISO 3166-1 alpha-3 code. We know of no basis for such an assertion. To the extent that parties have legally recognized rights in 3-character strings, they should submit to binding arbitration in an internationally recognized forum in which objective and reasonable standards apply. The IPC does not support restricting the eligibility of 3-character TLDs on the basis of the ISO 3166-1 alpha-3 standard. | **There should be unrestricted use of three-character strings as gTLDs if they are not conflicting with any applicable string similarity rules.** The IPC supports unrestricted use of 3-character strings as gTLDs if they are not conflicting with applicable string similarity rules. It should be noted that string similarity rules have applied to strings of any length, so it is unclear why this question is being asked. We would assume that three-character applications would be subject to all of the same rules as any other string (and not to any “special” rules).  |
| **.pl Registry Operator** | No, they should not, however all 3-character names listed in ISO tables are to be maintained in line with ISO rules and policy. This question is general one and somewhat misleading;  my understanding of this project is that we are not in position to break down the ISO eligibility rules and create our own on Internet with regard the 3-character names.   | Yes, they should, however we have to have in mind that the 3 – character names listed in ISO tables ( not only limited to ISO 3166-1) relate to the names of currencies, the names of languages, etc. The eligibility  should be maintained in line with ISO established policy.  In general there is no need to design  a policy which may limit Internet development.                | It would be reasonable to answer shortly by saying  yes, they should.  I think, that would wise to keep in mind that many governments in fact are not in position to predict the future of its states; please refer for instance to the example of former Yugoslavia or Africa where we can see many new countries  “born” in Africa, etc. What would be the value of the mentioned permission? For  how long will it be valid?  With that rule in mind, for sure, someone in the future would  have to decide what is at higher value by weighting an commercial interest vs. the interest of a new nation for instance?  Do we really consider, that our legitimate is sufficient? and could  prevail the one by UN? As already mentioned, the “ delegation  ( free) for assignment by ISO” 3-character names shall be handled by ISO.  In addition, we can see that, there are many 3 –character names which most probably will be never used by ISO; and I do believe that ISO knows that and keeps the list. I think, that these 3-character names should be allowed in naming of the top level domains.   | In order to be consistent with the rules and policies we have already got  I would vote for the unrestricted use, however the definition of the meaning of “ unrestricted” in this context has to be set first.   Having in mind the understanding of intention presented above, I found this question  as general one. |
| **.hk Registry Operator** | Yes, all country and territory 3-character TLDs should be reserved as ccTLDs only and be ineligible for use as gTLDs. Otherwise, confusion and wrong perception will be caused to Internet users as to whether the 3-character TLD or the 2-character ccTLD is the true official representation of the country/territory. Also, the basic difference between ccTLD and gTLD is that a ccTLD represents country/territory and gTLDs are for generic terms with no geographic connotation. | Apart from the 3-character codes on the ISO 3166-1 list, there may be codes or strings which are 3-character or longer which are commonly accepted/used for specific countries or territories but not on the ISO list. These should be ineligible for use as gTLDs too. Otherwise gross misunderstanding and confusion will be caused on which ones of these are the ones truly representing the country/territory.    | This is ok. But all ccTLDs should be consulted rather than only those which are thought to be relevant. | This is not sufficient. See answers to Q1, 2, 3 above. |
| **Partridge and Garcia PC** | Three-character top level domains should be eligible for use as gTLDs by any qualified party, and should not be reserved as potential ccTLDs. The countries and geographic interests represented in the ISO 3166-1 alpha-3 codes are wholly represented by the ISO 3166 alpha-2 codes that they are based upon. Therefore, reservation of 3 letter codes would be completely redundant and serve no apparent purpose.Since the gTLD space has historically been built on three-character codes, such as .com, .net, and .org, there is a high degree of consumer comfort favoring new three-character gTLDs. A reservation of all new three-character top-level domains would:1. Disallow all three-letter words, acronyms, and combinations from consideration as ***new*** gTLDs (see chart in response to question 2, below, for examples), severely hampering businesses right to enter into the technological space;
2. Be impractical and effectively extinguish rights in ***existing*** 3-letter gTLDs; and
3. Would significantly impinge upon well-established, internationally-recognized private rights without justification.

Any effort to eliminate any future use of three-character top-level domains should be rejected. This option is a solution in search of a problem which does not exist. | No, for the reasons listed above. | Yes, for the reasons listed above. | For the following reasons, Partridge & Garcia disagree with the points raised by Norway with regard to three-letter characters. Norway’s only reasoning for the reservation of the 3-letter country codes from use as gTLDs is that doing so would create end user confusion. However, Norway does not provide any evidence that this confusion exists, or would exist in the future. There is no evidence of end user confusion existing between countries and similar current 3-letter gTLDs. For example, end users are not confused that .COM represents Comoros, that .BIZ represents Belize, or that .NET represents the Netherlands. These countries’—and all other countries with ISO 3166 alpha-2 codes—interests are currently completely protected by their 2-letter country codes (.CO, .BZ, and .NL, respectively).ICANN’s gTLD Applicant Guidebook reasons how it would be unlikely for there to be confusion between a 3-character string and a 3-letter country code, due to the high “probable” standard for String confusion to exist: String confusion exists where a string so nearly resembles another that it is likely to deceive or cause confusion. For a likelihood of confusion to exist, it must be probably, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another to mine, is insufficient to find a likelihood of confusion.Guidebook, Section 3.5.1. Contrary to Norway’s claim, it is not probable that all new three-letter gTLDs, or potential ccTLDs, will cause end user confusion. Furthermore, there is already a well-established, internationally-recognized forum that exists that is able to determine whether a gTLD application is likely to cause string confusion: ICANN String Confusion Dispute Panel. This body, rather than a blanket reservation of all three-letter country codes for gTLD use, is the best mechanism to examine potential user confusion on a case-by-case basis. A blanket ban on new three-character gTLDs is not a favorable policy due to the convenience of three-character gTLDs for Internet users and lack of proof that new codes will cause confusion. Presently, there are over 130 three-character gTLDs. These codes are easy for Internet users to remember and type. There is no proof that adding new three-character gTLDs will create end user confusion.A significant reason that potential three-letter gTLD codes should not be denied because they are the same as existing alpha-3 codes from the ISO 3166-1 list is it would prevent many private and public entities from entering into the technological space and asserting their intellectual property rights. There is no persuasive reason why this basic legal right should be hampered. The existing alpha-3 country codes would be in conflict with many companies and organizations that should have the right to be eligible for gTLDs. These codes serve as acronyms for large organizations, airport codes, names of companies, and words in the English language, as exemplified in the chart above. (there are undoubtedly numerous other acronyms based on non-English terms as well). It would exclude many companies and organizations from applying for gTLDs as a business strategy. The entities applying for a gTLD are not akin to a cybersquatters seeking to make a quick dollar off of consumer confusion. The new applicant’s will not be frivolously occupying domain name space on the internet. Applying for a gTLD is a very robust, expensive process. Before application, a conscious organizational decision must be made, in advancement of a legitimate interest. Therefore, there should not be a blanket restriction on the use of three-letter domain names that identical to three-letter country codes. |
| **GAC Finland** | It would be extremely confusing, if all three-character top-level domains would be reserved as ccTLDs at this point. Many three-character gTLDs already exists (.com, .net, .xyz, .top, .win etc.). Can't and shouldn't be changed anymore. | This would be an equal and simple solution for all (both ccTLDs and gTLDs). It requires that ISO 3166-1 list must be "up-to-date" all the time. | This could theoretically work, but needs more clarification and it's hard to make it work in practice. Would be difficult to categorize, what is "relevant documentation" from relevant government or what is "relevant public authority". Difficult to categorize, which three-character strings would/might violate rights of governments or public authorities. Which bodies would make decisions in ICANN? There has already been this type of problems (.africa case). | This is the current situation. Easy, open and equal solution. "Let the market decide." Brand owners need to able to use their names as gTLDs. |
| **GAC Switzerland[[1]](#footnote-1)** | Switzerland proposes to tackle the issue of the future use of three-character codes as TLD according to the following methodology: initially, it is essential to clearly delimit the three-character codes concerned by means of a protection mechanism. It would then be advisable to define the protection mechanism itself and, finally, to rule on the method of use of protected and non-protected codes.1. Clear delimitation of the set of three-character codes which it would be useful to protect - Reference listsThe three-letter codes submitted to any protection mechanism must be clearly determined. The use of official international lists seems to be a good solution. Other solutions based, among other things, on "string similarity rules" must be avoided as they would generate too many uncertainties and result in overly complex processes.In Switzerland's opinion, the ISO 3166-1 alpha-3 list represents a good starting point, but governments/public authorities should also be able to consider or invoke other lists in order to protect an abbreviation linked to their country. As a minimum, in addition to the ISO 3166-1 alpha-3 list, the following lists should be integrated: - ITU (International Telecommunication Union - link);- IOC (International Olympic Committee - link). Other lists could also be considered, but do not have priority:  - ISO 4217 (currency codes - link); - IATA codes (cities, airport locations...).  2. Protection mechanismGovernments/public authorities should be free to choose to protect all or some of the codes which are included in the reference lists and for which they are competent. It should be possible to do this using a simple notification system (opt-in) without governments/public authorities having to justify their choice or their decision. 3, Use of three-character codesIn principle it is possible to reserve the three-character codes protected by the mechanism defined above as ccTLD. Unprotected codes would be available as gTLD and ICANN would be able to deal with them freely. In our opinion it would also be essential to consider in the same way the three-character IDN codes (for example Cyrillic three-letter codes according to GOST 7.67 or ISO 3166-88 standard - link) as well as entirely numeric three-character codes (e.g. according to ITU-T E.212 or ISO 3166-1 numeric), in so far as entirely numeric labels are considered for the next rounds of gTLD.The position outlined above does not conform to any of the scenarios proposed in the CWG-UCTN questionnaire, but is positioned somewhere between scenarios 2 and 3. |
| **.be Registry** | We don’t consider this to be a good idea. The majority of three-character TLD combinations don’t have any link with a specific country or territory and thus such a policy would be considered as contrary to the whole idea of introducing new gTLD’s: offer new possibilities to potential registrants. Also, this would be very difficult to reconcile with the current reality where in each phase of adding new TLD’s to the root, 3-character TLD’s were allowed. How would one be able to explain that .com, .net, .org & others were allowed in the early days but no new 3-character TLD’s will be allowed in future rounds? How to explain that in the current round 3-character TLD’s were possible but in future round they would be excluded? | Yes, that seems a fair policy. Advantage is that it is very close to the guidelines that have been followed in the earlier TLD rounds and especially in the current one. It provides a right balance between the rights of the ccTLD’s (and their respective governments) and those of third parties wishing to open up the market for new possibilities. But I would add a condition that a 3-character TLD cannot be eligible if there is a string similarity issue. | I can see the benefits of a scenario that is equal to the one described under 2 but with the notion that also support documentation or at least non objection from the relevant government is required. That could be a compromise in order to get support from the GAC. But we fail to see why governments should have a right to object against 3-character TLD strings that have nothing to do with existing alpha-3 codes? This would lead towards the situation where an applicant with an interest in .pop would have to seek support from governments in order to get his TLD? And to which government he should turn in that case? Could it be that the question is ill posed and is to be read as follows: 3-character strings are eligible unless they are in conflict with existing alpha-3 codes and no documentation of support or a non-objection of the relevant government or public authority has been given?  | Yes, that seems a fair policy as well but we would like to see it combined with the scenario under 2. It will protect the interests of ccTLD’s, relevant governments or public authorities + existing other TLD’s. In particular, such a policy would prevent confusion between already delegated and in use TLD’s and new applications. |
| **.tn Registry** | Yes, three-character top-level domains be reserved as ccTLDs only and be ineligible for use as gTLD. It gives us the opportunity within the country to create an industry from our cctlds. For .tn case, .tun is also a cctld for Tunisia and we can make them grow together, enhancing the local content. In addition, we are studying the opportunity in the near future to liberate .tn for international registrars. We can keep .tun  for local registrars to make their business locally. It's an opportunity for us to set up a cctld industry. | Yes, the advantage is to allow the countries to create an industry of these domain names that affects their local economy (create new business with new jobs and enhancing the local content). | No, Because as I said before we want to make a cctld industry. to be more clear for our case .tn we are preparing to liberate to international registrars some thing we will do it for .tun after many years, Gtlds have already a wide market and wide choices. | Yes, as I said before it's an opportunity for the countries to create a domain name industries that affects their economy. |
| **.cr Registry** | Three-character top level domains should be reserved as ccTLDs ONLY assuming the existing ccTLDS will manage them. If this opens the possibility that a country may have two ccTLDs managing organizations this will bring about serious cannibalization and instability in the Internet policy and development of nations. Furthermore, it will seriously affect the cooperation and unity that has characterized the ccTLD community thought it´s history. Assuming only existing ccTLD will also be delegated three character top level domain together with the current two character TLDs, this may prove to be an important source of income in the short term (mostly due to trademark protection) but in the long term it might not prove to be a very successful product since it competes directly with the existing two character country code TLD and may just lead to cannibalization. As the current new gTLD program has proved, having too many TLDs creates a lot of noise in the domain market (everyone trying to sell domains at the same time to the same people) and its hard to define the differences and benefits or using one over the other. Furthermore, taking a more global perspective, expanding the root of the Internet even more does not bring any benefits to the growth, stability and resilience of the Internet. This policy is no way helping the technical and security concerns of the DNS, it´s seems to be only addressing financial interests.  The failure of the gTLD program should serve as an example of the negative press, consequences and turmoil comes when ICANN only focuses on financial interests. As mentioned earlier, the only benefit of this policy would be a short term financial gain in sales for ccTLDs.  | NIC .CR strongly opposes the use of 3 character top level domains for use as gTLDs when these refer to country or territory names. Three character top level domains that refer to countries or territories will have a direct negative impact on ccTLDs whether they are in the Iso 3166-1 list or not. This is a policy that will further limit the market of ccTLDs and as such can eventually lead to the closure of many, specially the ones in the developing nations that compete in smaller markets such as .cr.  The fact that gTLDs brought about about 2,000 new gTLDs has has a strong impact in the ccTLD market, and many of these gTLDS include cities and locations. Adding three character top level domains for country and territory use will simple decrease even more the market share of ccTLDs. It is important to take into account that ccTLDs are not just in charge of managing their country top level domains but have a key role as ICANN´s representation of policies, technical advice and the multistakeholder model for a free and open Internet view across the globe. ccTLDs are ICANN´s allies and work together with all Internet agencies to create a more stable and secure Internet. Most ccTLDs are not-for-profit organizations that base their income on the sales of their TLDs. This initiative (three character top level domains for countries and locations) is a way to eliminate ccTLDs in emerging economies that in long turn will hurt ICANN as well.  The domain name market is being seriously affected by the use of social media and apps. Further breaking this pie in the three charter top level domain level is just an unnecessary way to continue to cannibalize among TLDs. I see no advantaged of this policy.  | No, three-character strings should not 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.  The same disadvantages mentioned in point 1 and 3 apply.  NIC CR sees no advantages of such policy. In many countries, there is tension between a government and ccTLD since a ccTLD may contradict or question the Government´s stand in Internet issues. For example, a government may push for singing the WCIT in Dubai in 2012 and the ccTLD may oppose that position and support a free and open Internet (this among thousands of examples). With this reality in mind, it is very easy to obtain the government of public authority´s documentation to apply for a three character string for use a gTLDs since it is an excellent opportunity to crush the existing ccTLD in the country. It can actually prove to be a way to strategically eliminate many ccTLDs who are doing great work worldwide, supporting ICANN and a free and open Internet. I emphasize on the importance of ICANN in focusing on strategy, technical issues and governance, and leave aside financial interests. Moving forward this policy, will in the long turn hurt ICANN enormously since it will lose the current representation and support that ccTLDs provide (from a technical and political standpoint). I see absolutely no advantages of such policy.  | No, there should not be an unrestricted use o three character stings as gTLDs if they are not conflicting with applicable string similarity rules. The unrestricted use of more than three character stings as gTLDS (the new gTLD program) proved to be an enormous headache full of legal conflicts, many interested parties involved, governmental intervention and a very complicated technical and administrative execution. ICANN needs to learn from past mistakes. Doing the same for three character strings will become another long internal and external battle for ICANN which will take focus, resources and budget away from more important technical and Internet governance issues. Also all disadvantages mentioned on point 2 and 3 apply. I see no advantage of such policy.  |
| **Centre Survey****(22 respondents)[[2]](#footnote-2)** | 73% Yes27% No | 59% Yes14% No27% Unsure | 32% Yes50% No18% Unsure | 64% Yes23% No14% Unsure |
| **.sv** | Yes, they should be reserved as ccTLD and be ineligible for use as gTLDs. Pros: avoid confusion in general public, since there is one and only one table in ISO 3166-1 that includes both 2 and 3 letter codes referring to the same country or territory. The two versions (2 and 3 characters) are equally the official representation of the country or territory, so they should hold the same treatment from the TLD designation logic. | In principle, the 3 character codes that are NOT in the 3166-1 list could be eligible for use as gTLD. However, how about possible new codes entering the table in the future, if they have already been assigned as gTLD? Pros: continue fostering competition in domain names. | If they are NOT in the 3166-1 list, why should these 3-character codes need support or non-objection from governments or authorities? There should not need that support. Pros: continue fostering competition in domain names. | In the spirit of an open and competitive environment in the domain names industry, there can be unrestricted use of 3 character strings not conflicting with country and territory codes. Pros: continue fostering competition in domain names. |
| **Yuri Takamatsu**  | No. Limiting the use of three-character strings or labels which have significant social value will decrease the usability and the value of the Internet. | No. Limiting the use of three-character strings or labels which have significant social value will decrease the usability and the value of the Internet. In addition, the future change of ISO-3166 list is very probable and we should not depend on the current list. | No. We can't comment on this because the situation assumed above can't define "relevant government" or "public authority". | Yes. In principle, the labels with three characters should be treated in the same way with more than three-characters. Basically the registration and usage of the labels with three characters should be unrestricted. |
| **.hn** | We think that should be reserved for ccTLDs. Disadvantage: If we reserve them for gTLDs it would turn them into monopoly, and would weaken ccTLDs, which encourages purchasing exclusion by market value, insecurity. Advantage: If we reserve them to ccTLDs they would strengthen and this guarantees their sustainability and would become more competitive. | No. This is a disadvantage. This would limit the market for ccTLDs, and leads to the of decline ccTLDs. Advantages: None. | No | No. We already mentioned the reasons why it shouldn’t. |
| **.no** | This is a wrong kind of question. ccTLDs as such are 2-letter codes and it should remain so. In our view some 3-letter codes could be gTLDs; namely those not on the ISO 3166-list. See our answer to question 2. | Yes. All 3-character strings that are not in conflict with 3-letter codes from ISO 3166-°©‐ 1 list, which represents countries and territories, could be eligible as gTLDs. This is in compliance with the Applicant Guidebook as it was for the first round – a compromise reached after years of discussion. But if 3-letter codes on the ISO 3166 list are allowed as gTLDs, there will be confusion among users. Some country & territory representations being 2-letter codes run by national laws and 3-letter codes possibly representing country or territories under the global ICANN regime / global law. | This is a possibility that should be considered. There might be countries in the world where the 2-letter code is taken by commercial interests and are not run as a “proper” TLD according to RFC 1591 etc. Then the country could have their 3-letter code instead. This would also follow the system of today where capitols and cities need support or non-objection from the relevant government or public authority of the country. But this would still be a gTLD under the gTLD regime, with the possibility of confusion for users. | No. We are not in favour of unrestricted use of 3-character strings. See our answers above. |
| **.pa** | Yes, they should be reserved as ccTLDs only.All three-character top-level domains should be ineligible for use as a gTLDs.Advantage: Prevent confusion in the general public. As there is one and only one table in ISO 3166-1, which includes both codes, 2 and 3 letters (characters), codes that refer to the same country or territory. The two versions, 2 and 3 letters (characters) are equalitarian to the official representation of the country or territory and therefore must maintain the same treatment for the logical designation of a TLD. | 3 character codes that are not in the 3166-1 list should not be eligible for use as gTLDs. If they are used now, if assigned as gTLDs now, in the future there may be conflict with those potential new codes that require entry in the table.Advantage: Continue to promote competition in the current domain names. | Should not be eligible.Advantage: Prevent confusion in the general public. Continue to promote competition in the current domain names. | Must not be allowed unrestricted use of the 3-character string as gTLDs because it conflicts with the codes of countries and territories.Advantage: Continue to promote competition in the current domain names. |
| **.de** | DENIC believes that "country code" TLDs should strictly be limited to two character codes as per ISO3166 (IDN ccTLDs notwithstanding).  The introduction of a new Three-Letter-"Country Code" category is likely to introduce confusion and blur the unique position that ccTLDs have maintained successfully. | DENIC believes that changes over time regarding the code points listed in the three letter list would have to be addressed to maintain a consistent regime. Similarly, the alpha-3 list has certain code points for 'private use', all of which would have to be used in a consistent fashion. Therefore, this appears to be a less favorable option. | It is unclear to us how an assignment that does not match ("conflict" with) a code on the alpha-3 list would lead to a "relevant government". Assuming the "and" was an "or", first our comment to point 2 holds; secondly, for reasons of distinction, the only legitimate and established use of a country code has a length of two letters.  Unless the 3 letter code would match a well known abbreviation (or even the name) of the country, there would be no good reason to give public authorities a special voice. | DENIC does not want to judge the peculiarities of "applicable string similarity rules", but "unrestricted use" looks like the most consistent approach in general. |
| **.ar** | NIC Argentina does not consider necessary to ban gTLDs from using three letter character top level domains, still there are some considerations that should be taken into account such as reservation of the Alpha -3 codes from ISO 3166-1 list. | NIC Argentina considers this policy to be of the outmost importance because of the danger of having end user confusions about countries, ccTLDs and gTLDs. The alpha 3 codes are  not only a part of internet but also represents a very distinguishable name of each country in everyday life. | NIC Argentina considers that this matter shouldn´t be taken lightly, because this case may be very easily confused with the ccTLD. Not all ccTLDs are run by governments, but are an essential part of the internet ecosystem within the country, and as such, this confusion might lead to severe competition which may prove prejudicial for its country and end users. | NIC Argentina considers that not conflicting three character strings as gTLDs would be ok. |
| **.fi** | Shouldn't be changed at this point anymore.Risk: Many three-character gTLDs already registered. Can't be changed anymore | Equal and simple solution for all Risk: ISO 3166-3 must be "up-to-date" all the time | Could work but needs more clarification.Risk: Difficult to categorize, what is relevant documentation from relevant government of public authority. ICANN should not be required to decide which three-character strings would/might violate rights of governments. | Let the market decide. Open, equal solution. |
| **GAC** | The GAC does not think that it is necessary or feasible to reserve all 3-character codes as ccTLDs at the top-level and notes that in practice, nearly 150 three-character ASCII codes already operate as gTLDs in the DNS. It does not, however, follow that all 3-character codes should be eligible as gTLDs, in particular country codes (see detail in letter above). | Many GAC members believe that the existing alpha-3 codes from the ISO 3166-1 list should continue to be ineligible for use as gTLDs, as they are in the current version of the gTLD Applicant Guidebook. Furthermore some GAC members believe that other codes corresponding to countries and to governmental functions should also be protected (see detail in letter above). | The GAC thinks that this scenario is promising and definitely warrants additional consideration. Practical aspects should be investigated in more depth. | Relying on "string similarity rules" to protect certain strings should be avoided as it would generate too much uncertainty and complexity in the process. |

1. [↑](#footnote-ref-1)
2. Participating cc-TLD registries: .al, .be, .ch, .de, .dk, .ee, .es, .hr, .is, .jp, .lu, .lv, .me, .mt, .nl, .no, .pl,

.pt, .rs, .ru, .se, .tr; for individual responses, see: <https://community.icann.org/download/attachments/49354211/ccTLDSurvey.pdf?version=1&modificationDate=1448464976361&api=v2> [↑](#footnote-ref-2)