CTN-crosscom questionnaire on 3-character codes

Response of GREECE:

General remarks: While responding to this questionnaire, we had in our mind the following provisions for the "3-character strings" into question:

a) The characters of the "3-character strings" under question can be numerical digits (0-9) or any letter of any alphabetic script (e.g. Latin, Cyrillic, Greek, Armenian, Georgian etc) and not ideograms, e.g. of scripts such as Chinese-Japanese-Korean (CJK), Arabic etc.
b) IDN "3-character strings" consist of at least one character that does not belong to the ISO646BV ("old ASCII"). In the case of IDN "3-character strings", only small letters are allowed, as the IDNA2008 protocol does not accept capital letters. We believe that we have to take that under consideration when discussing similarity issues.
c) Script mixing is not allowed in the "3-character strings" under question.
d) Some alpha-3 codes from the ISO3166-1 list are already used as gTLD (e.g. 'COM').

Q1: 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?

GR1: Greece does not agree with this proposal, since there are already some gTLDs consisting of three letter combinations.

Q2: 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 ISO3166-1 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?

GR2: Greece does not agree with this proposal as it is. The ISO3166-1 alpha-3 code for Greece is 'GRC' and this is used for the representation of Greece in ITU and elsewhere. However, the three-character combination 'GRE' is used worldwide too, for example by the International Olympic Committee and other sport organisations for the representation of the Greek national teams and the Greek athletes. Moreover, the three-character combination 'ELL' is also used among the programmers in order to indicate that a specific set of parameters (i.e. Greek) will be used in a specific programming set of coding. Taking into consideration the above mentioned cases, we come in the conclusion that not only 'GRC' but also at least the

other two three-character combinations (i.e. 'GRE' and 'ELL') indicate Greece. Thus, the Greek government has legitimate sovereign rights over all the above mentioned three-character combinations and not only over 'GRC' just because it is the alpha-3 code for Greece in the ISO3166-1 list and cannot accept the use of 'GRE' or 'ELL' as gTLDs. On the contrary, these codes could be used as Greek ccTLDs under the Greek legal framework or simply be reserved by Greece. As is clearly shown from the above, Greece sees no advantage at all of such a policy.

Q3: In future, should three-character strings be eligible for use as gTLDs if they are not in conflict with existing alpha-3 codes from the ISO3166-1 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?

GR3: It is good that the respective alpha-3 codes from the ISO3166-1 list are protected. However, we believe that in order for this question to be properly answered, an Early Warning System (EWS) should be established. If a three-character string (different from any alpha-3 code of the ISO3166-1 list) is selected by an applicant to be used as a gTLD, all the governments or public authorities should be somehow notified by this Early Warning System and if any government or public authority claims that it is relevant and this is the only one that does so, then, of course, the two parts i.e. the relevant government or public authority and the gTLD registry-to-be can come into any kind of agreement. If more than one governments object to the registration, a multi-stakeholders agreement could resolve the case, or the name could be reserved from registration, for future use by these specific governments.

Q4: 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?

GR4: If any string similarity rules are going to be used, then these rules should apply the same to any case, in the ccTLD and in the gTLD domain space. If these string similarity rules are in place and there are three-character strings that are not conflicting with such rules, then we are of the opinion that these three-character strings could be used as gTLDs, depending of course to the outcome of the EWS explained in the previous question.

Q5: 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?

GR5: First of all, the points (a), (b) and (c) in the beginning of our response should be always taken into consideration. For equality reasons to the rules for Latin scripted

gTLDs, we are of the opinion that a simple answer to this question is "no". However, each application should comply with the similarity rules and should be considered as valid for use only if the interested governments do not object to its use, through some EWS system that will be introduced by ICANN.

Q6: 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?

GR6: Greece is of the opinion that if a string does not present any similarity issues, it should be considered as valid for use only if the interested governments do not object to its use, through some EWS system that will be introduced by ICANN.