



**Comment on Proposed  
Implementation of GNSO  
Recommendations for  
Protecting IGO & INGO  
Identifiers in All gTLDs**

Status: FINAL

Version: 2

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**Business Constituency Submission**

**GNSO//CSG//BC**

## Background

This document is the response of the ICANN Business Constituency (BC), from the perspective of business users and registrants, as defined in our Charter:

The mission of the Business Constituency is to ensure that ICANN policy positions are consistent with the development of an Internet that:

1. promotes end-user confidence because it is a safe place to conduct business
2. is competitive in the supply of registry and registrar and related services
3. is technically stable, secure and reliable.

## Comment

The Business Constituency (BC) appreciates the opportunity to comment on the “Proposed Implementation of GNSO Recommendations for protecting IGO & INGO Identifiers in All gTLDs. (at <https://www.icann.org/public-comments/igo-ingo-protection-2017-05-17-en.>)

We note that the BC made extensive comments on the 2013 Draft Final Report on Protection of IGO and INGO Identifiers in gTLDs.<sup>1</sup>

**The BC supports the currently proposed implementation recommendations, with qualifications as noted below:**

1. DNS Label Conversion Rules. The BC supports the recommended DNS Label Conversion Rules which defines how protected identifiers on the protection list that do not conform to the framework of DNS permissible characters will be converted to DNS permissible equivalent characters (letters, digits and hyphens).
2. INGO Claims Notification. The BC supports the proposed language<sup>2</sup> that will be sent to a potential registrant if the potential registrant attempts to register a domain name that is an exact match of the DNS Label on the INGO Identifier List.
3. Updates to IGO Identifier List. The BC supports using the IGO names list provided by the GAC, which currently contains one language and allows for adding a second language when available, to create the initial list of the DNS Labels as required by the policy recommendation.

Regarding Changes to identifiers for Red Cross, IOC and IGOs, the BC supports permitting Names to be added to or deleted from the Identifier List upon ten (10) calendar days’ notice from ICANN to the Registry Operator. However, the BC believes that ICANN should consult with both the GNSO and the GAC in relation to any proposed changes to the names on the Red Cross, IOC and IGO Identifier List so that the GNSO has the ability to assure that such Name changes are consistent with the underlying policy.

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<sup>1</sup> Nov-2013 BC Comment, at <http://www.bizconst.org/assets/docs/positions-statements/bc-comment-on-igo-ingo-protection1.pdf>

<sup>2</sup> Appendix A; <https://community.icann.org/display/IIPIRT/Documentation?preview=/56136698/64079076/IGO-INGO%20Identifier%20Protection%20draft%20v10%2020170315.pdf>

Additional point regarding existing registrations in gTLDs:

The BC supports requiring that where a domain name containing an exact match name from the Red Cross, IOC, and IGO Identifier List, was registered before this Consensus Policy effective date or 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. The BC also urges further clarification of this provision to assure that the domain registrant has sole discretion to renew or transfer such domain without registry limitation.

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This comment was drafted by Alison Simpson, Andrew Mack, and Phil Corwin.

It was approved in accord with our charter.