

Public comment item <https://www.icann.org/public-comments/two-char-new-gtld-2014-09-12-en>

The Business Constituency (BC) supports the release of all two-character ASCII labels that do not correspond to any label on the ISO 3166-1 alpha-2 list, and requests that appropriate and established safeguards are put into place to protect consumers when these labels are released for registration, including requiring a Sunrise Period for eligible applicants.

As observed by the Governmental Advisory Committee (GAC) in its Los Angeles Communiqué, two-character second-level domain names are in widespread use in legacy gTLDs and have not affected the security, stability or resiliency of the DNS . Further, there are no widespread reports or complaints from governmental authorities that the use of two-character ASCII labels (including those that correspond to a ISO 3166-1 alpha-2 listing) in legacy gTLDs has resulted in consumer confusion with assigned or in-use ccTLDs.

Once ANY two-character label (including those on the ISO 3166-1 alpha-2 list which are released with the permission of governments and country-code managers) are released for registration, they must be subject the same Rights Protection Mechanisms as any other second-level registration in the TLD in question (including the option to block as available). Registry Operators must, at a minimum, provide standard Sunrise and Trademark Claims Services to protect brands who may own a Trademark in a two-character label, such as an acronym. Such safeguards would adequately address the remaining concerns of the BC in this regard.

This comment was approved in accord with the BC Charter.
24-Oct-2014