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D.O.No.L-13014/9/2015-IGD

दिनांक / Dated.....22-11-2017.....

Dear Mr. Chalaby,

This is with reference to ICANN Board's resolution dated November 8, 2016 authorizing registry operators to release for registration to third parties all reserved letter/letter two-character ASCII labels at the second level in new gTLDs. At the outset, we wish to categorically state that the blanket authorization issued by the Board does not take into account concerns raised by member countries and effectively undermines the role of GAC at ICANN.

The Government of India has always objected to the allotment of 2 character ccTLDs at the second level and has communicated its apprehensions to the ICANN Board in the past. We believe that till such time that well defined mitigation measures are agreed upon and put in place by the proposed task force, **ICANN Board is requested to reconsider its resolution dated November 8, 2016 and prohibit the use of 2 character ccTLDs at second level without consent from respective national Governments.**

Further, we are of the opinion that **country and territory names should not be released for registration at any level without prior approval from respective national Governments.** In addition to causing consumer confusion, release of country/territory names at any level may also lead to misuse by *mala fide* registrants. You may appreciate that if legitimate concerns of Governments are not addressed, Governments may be compelled to take safeguard measures including blocking of such domains.

We also wish to highlight the limitations of relying solely on ISO 3166 list while deliberating on geographic names. It is imperative to understand that ISO 3166 list was created long back and it was not conceptualized in the context of internet registry. Consequently, many geographic entities / regions fail to qualify as a geographic name for the purposes of string delegation owing to these not being present in the ISO 3166 list. Therefore, it is felt that a separate repository of terms with geographic significance should be created in collaboration with GAC in order to address legitimate concerns of national governments.

With warm regards.

Yours sincerely,

(Sanjay Kumar Rakesh)

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