

Ms. Elise Gerich
Vice President, IANA and Technical Operations

12 June 2012

Dear Elise,

Thank you for your letter dated 7 May 2012 seeking input from the ccNSO on ICANN's position regarding the protection of all possible two-character ascii strings under the Fast Track Process.

The Fast Track Process is the result from extensive consultations on both the methodology and implementation of the methodology. The Fast Track methodology was adopted by the ccNSO at its meeting in Paris, June 2008 and sent to the Board for adoption (IDNC Working Group Board Proposal 25 June 2008). The Fast Track Implementation Plan was adopted at the ccNSO meeting in Seoul, October 2009.

According to the IDNC Working Group Board Proposal, one of the requirements that an IDN ccTLD string must meet, is verification that the proposed code cannot be interpreted as any of the elements in the alpha 2-codes used by the ISO 3166/MA (section 5.2 of ISO 3166-1: 2006). The alpha 2-code is a combination of two letters of the 26-character Roman alphabet (ignoring diacretic signs) from the range AA to ZZ. It is our understanding that this requirement has been implemented through the Fast Track Implementation Plan, in particular through prohibiting IDN strings that are confusingly similar to any combination of two ascii characters.

Further, to date the ccNSO Council has not received any suggestion that any combination of two-letter ascii codes should not be protected, nor that the confusingly similarity review should be discontinued.

At the same time, the ccNSO Council is aware that under the IDN country code Policy Development Process and under the evaluations of the Fast Track process changes to the confusingly similarity review have been suggested. However, these suggestions do not imply a change to the principle to protect two-letter ascii codes.

The ccNSO Council supports ICANN's position that all possible strings of combinations of two ascii characters should be protected under the Fast Track Process.

Best Regards,

Lesley Cowley, OBE
Chair of the ccNSO