

On behalf of the Internet Service Providers and Connectivity Providers constituency, we are submitting comments to the Initial Report on the Protection of IGO and INGO Identifiers of 14 June 2013.

Provisions to provide special protections to international organizations names and acronyms in new gTLDs have been requested on several occasions by ICANN's Governmental Advisory Committee (GAC) as a matter of global public policy, in particular for the Red Cross/Red Crescent, the International Olympic Committee and International Governmental Organizations (IGO). Most recently, in its Beijing Communiqué, the GAC "stressed that the IGOs perform an important global public mission with public funds, they are the creations of government under international law, and their names and acronyms warrant special protection in an expanded DNS." This request, in the cases of the Red Cross/Red Crescent and the International Olympic Committee, has been accepted by the Board, subject to the results of the PDP process started by the GNSO.

The PDP process considers not only IGO but also INGOs and in this category the special cases of the Red Cross and the International Olympic Committee.

The status of the international organizations considered in this PDP warrant the consideration of appropriate measures for the protection of their names in the Domain Name System (DNS).

The report of the PDP working group considers 4 different cases, Red Cross/Red Crescent, International Olympic Committee, International Governmental Organizations (IGO) and International Non-governmental Organizations (INGO).

In the case of the INGOs we consider that they don't warrant any special protections except those cases of certain International Non-governmental Organizations, like the Red Cross/Red Crescent and the International Olympic Committee, which have special protections awarded to their names through international treaties or national laws in an important number of countries.

A number of documents have been presented to ICANN's Board and the PDP Working Group, so we will restrict ourselves to indicate which of the different options presented by the PDP working group are supported by our Constituency.

For IGOs, Red Cross/Red Crescent and the International Olympic Committee:

1.- Top Level Protections.

We support Option 2: "Top-Level protection of Exact Match and Acronyms identifiers are placed in Applicant Guidebook section 2.2.1.2.3, of the Applicant Guidebook, Strings "Ineligible for Delegation". The strings to be included in the list would be the ones in the list presented by the GAC.

2.- Second Level Protection.

We support Option 1: “2nd-Level protections of only Exact Match, Full Name identifiers are placed in Specification 5 of Registry Agreement”

3.- Qualification Criteria. We support the qualification criteria 1 and 2, IOC and RCRC and the IGOs defined in the list managed by the GAC.

4.- Exception procedure. Though this was not proposed in the WG, we would support an exception procedure that would allow the IGOs to register their acronyms in the Trade Mark Clearing House, from the beginning of the Sunrise Period, and if a potential registrant claims a legitimate interest in a second-level domain name that coincides with an IGO acronym, this procedure would determine if the application can be clearly differentiated from the IGO and then would proceed with the registration.

Considering the types of organizations involved in this PDP we support also waiving the fees of the TMCH.