ICANN Registry Request Service

Ticket ID: H0X5C-4Q2T8
Registry Name: Who\\\'s Who Registry
gTLD: .whoswho
Status: ICANN Review
Status Date: 2014-09-16 20:44:42
Print Date: 2014-09-16 20:44:57

Proposed Service

Name of Proposed Service:

Release of Two-Character Domain Labels

Technical description of Proposed Service:

Who's Who Registry would like to offer all two-character ASCII labels for registration at the second level including those strings that are included in the ISO 3166-1 alpha-2 standard list of 2-digit country-codes.\r\n\r\nSpecification 5 (Schedule of Reserved Names), Section 2 of the New gTLD Registry Agreement addresses reservations of two-character labels except in such cases where the Registry Operator reaches agreement with the related government and country-code manager of the strings (which in the case of those strings not on the list are non-existent). Alternatively, the specification provides that the Registry Operator may propose the release of these labels based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN. \r\n\r\nWho's Who Registry hereby requests the release of all two-character strings. By nature of the .whoswho gTLD, a viewer-bias is created toward the SLD relating to a person, not a country/territory. In addition, the registry has added imposturous registrations as a justification for URS take-down of a domain, and this would apply equally to a country/state/region as to another individual.\r\n\r\nBy information and belief, implementation of the proposal would require an amendment to the Exhibit A of the Registry Agreement, and may require posting for public comment.\r\n \r\nThe specific domains to be added would include 1,296 combinations (= 36 X 36) of the letters a-z and the numbers 0-9. Because hyphens are proscribed in the first and last positions of domain strings, they could not be included in either position of a two-character domain label.\r\n

Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

See below.\\r\\n\r\n

a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

Registry is not a sponsored TLD. \\r\\n\r\n

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b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

Informal consultations were held by teleconference and in-person at ICANN 48, 49 and 50 with a cross-section of representatives from the registrar constituency. It is fair to say that, because the restriction is not due to any security, technological or other operational considerations, that the registrar community sees an expanded commercial potential as creating addition opportunity with an attractive offering. \\\\r\\\\n\\\r\\n\r\n

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Consultations with other constituency groups were not appropriate. However, if the submission of\\\\r\\\\nRSEPs seeking release of certain two-character domain names qualifies as empirical evidence, it is clear that there is significant support amongst members of the Registries Stakeholder Group. \\\\r\\\\n\\\\r\\\\n\\\\r\\\\n\\\\r\\\\n\\\r\\n\r\n

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

Ad hoc consultations with cohorts of the target registrant group were conducted over a period of time and, indeed, many well-known individuals will continue to want a domain string that matches their full names. There are others, however, whose initials spark immediate recognition (for example, JFK, LBJ, MLK, DSK, YSL), if not to the public at large, then perhaps to a particular segment. \\\\r\\\\n\\\\r\\\\nWhile the use of one\\\\\\\\'s initials is not something that is appealing to all individuals, one of the goals of the new gTLD offerings was to create additional choice for consumers. It\\\\\\\\'s about personal choice and communication style, and for those interested in new ways to connect with their public that\\\\\\\\'s very much native to texting millennials, the 2-chararacter domains JZ, KL and letter-number combos such as U2 and M0 (texting from The White House vegetable garden?) could be in demand. \\\\r\\\\n\\\\r\\\\n\\r\n\r\n

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

Registrants interested in obtaining two-character labels would endorse this proposal. \\\\r\\\\n\\\\r\\\\nRegistrars seeking attractive offerings for domain registrants would support the release of these labels.\\\\r\\\\n\\\\r\\\\nUltimately, any Internet user who has suffered keying in such strings as LifeOfPopeFrancis-TheMovie.tld or QueenElizabethII-TheMovie.tld would prefer and endorse F1.whoswho and /E2.whoswho, in lieu. \\\\r\\\\n\\\\r\\\\n\r\n\r\n

f. Who would object the introduction of this service? What were(or would be) the nature and content of these

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consultations?:

Based on GAC Advice related to similar proposed revisions, it is clear that the GAC is articulating a desire, not only to protect the allocated two digit country codes, but also the entire two-character namespace across every one of the almost 1,400 new gTLDs that are expected to launch. And, it should be added, to do so at substantial opportunity cost to gTLD investors.\\\\r\\\\n\\\\r\\\\nSince ASCII domain strings cannot exceed 63 ASCII characters, and for the sake of user convenience shorter is better (i.e., shorter domain names require less data keying to reach them). There are 1,296 (= 36x36) unique combinations of a-z and 0-9 with which to create such two-character domains. Under standard gTLD contracting terms, .whoswho and other gTLDs are by default required to keep unused the ~85% of inventory for which no corresponding two-character country codes exist. \\\\r\\\\n\\\\r\\\\nThe GAC appears to be concerned that because the 200+ country codes happen to be two-characters in length that any two character string will cause confusion. The Registry believes that, just as mobile phone use has swept across the lesser-developed parts of the world, exposure is the first step in the learning process. The launch of the ~1,400 new gTLDs provides no better impetus for such learning, as new strings to the right of the dot create the need for awareness and distinctions across the entire domain string. The Who\\\\\\\\'s Who Registry believes that, just as in the case of mobile phone use, the public in every corner of the world will rise to the occasion in their understanding that only the two-character domains to the right of the dot are the bailiwick of national governments.\\\\r\\\\n\\\\r\\\\nFurther, two-character domains are already used in several legacy gTLDs without any evidence suggesting that such use has resulted in consumer confusion. We are prepared to engage in dialogue with any government or country code manager of a string specified in the ISO 3166-1 alpha-2 standard list that raises concerns about releasing a two-character label that corresponds to that government's country code. In such a case, we propose that the related ISO 3166-1 alpha 2 code for that country be excluded from this RSEP request until the resolution of any such objection.\\\\r\\\\n\\\\r\\\\n\\r\\n\r\n

Timeline

Please describe the timeline for implementation of the proposed new registry service:

Who\'s Who Registry hopes to channel two-character ASCII labels into the registrar pipeline as soon as it is reasonably practicable.\r\n

Business Description

Describe how the Proposed Service will be offered:

The proposed services will be offered together with all other second level domains in .whoswho, and on comparable terms.\r\n

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Describe quality assurance plan or testing of Proposed Service:

As implementing this service will not require any adjustments to Who\'s Who Registry\'s technical infrastructure, \r\ncurrent methods of ensuring quality services will be maintained when the offering of two-character domains comes on stream. Additionally, Neustar, our backend registry service provider also serves as the Registry provider for the .biz, .tel, and .travel TLDs for which two-character labels are already available for registration.\r\n\r\n

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

Not applicable.\r\n

Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

Registry Agreement, Specification 5, Section 2: Two-character labels. \r\n\r\nAll two-character ASCII labels shall be withheld from registration or allocated to Registry Operator at the second level within the TLD. Such labels may not be activated in the DNS, and may not be released for registration to any person or entity other than Registry Operator, provided that such two-character label strings may be released to the extent that Registry Operator reaches agreement with the related government and country-code manager of the string as specified in the ISO 3166-1 alpha-2 standard. The Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN. Upon conclusion of Registry Operator\\\'s designation as operator of the registry for the TLD, all such labels that remain withheld from registration or allocated to Registry Operator shall be transferred as specified by ICANN. Registry Operator may self-allocate and renew such names without use of an ICANN accredited registrar, which will not be considered Transactions for purposes of Section 6.1 of the Agreement.\r\n

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

None\r\n

What effect, if any, will the Proposed Service have on the Whois?:

None\r\n

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Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:

Registry Agreement Specification 5, Section 2 should be amended to read as follows:\r\n\r\n"Notwithstanding Section 2 of Specification 5 of the Agreement, Registry Operator may offer registrations for and activate in the DNS all two-character ASCII labels."\r\n

Benefits of Service

Describe the benefits of the Proposed Service:

Registrants and end users will benefit from the proposed service because for every gTLD whose unallocated two-character domain strings are released, another 1,296 short, easy-to-remember, and easy-to-key -into-a-mobile-device domain labels can be made available for registration. The benefit of this proposed service is that it delivers new product to a market that wants them, and it\'s all being realized from waste within the current system.\r\n

Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

The release of these two-character ASCII labels into the marketplace will positively affect competition. In addition to allowing registrants to obtain compact names that identify them to their satisfaction, it\'s a plus for competition. \r\n

How would you define the markets in which your proposed Registry Service would compete?:

We are in competition with other registries who offer ASCII domains and who may, or may not, have an interest and\r\ndemand for two-character domains. The two-character domain name is a niche market. It is therefore well-suited to a global niche registry such as .whoswho\r\n\r\n

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

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A number of registries are permitted to sell or renew two-character labels, regardless of whether they appear on the ISO 3166-1 alpha-2 list: Afilias Limited (.INFO), Neustar, Inc. (.BIZ), RegistryPro, LTD. (.PRO), TLD, Ltd (.MOBI), VeriSign, Inc. (.COM/.NET), Public Interest Registry (.ORG), DotAsia Organisation Ltd. (.ASIA), Telnic Ltd.\r\n(.TEL), Fundacio puntCAT (.CAT), Tralliance (.TRAVEL), DotCooperation LLC (.COOP), EmployMedia LLC\r\n(.JOBS), Global Name Registry, LTD (.NAME). \r\n\r\n

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

No, the introduction of the proposed registry service would not impair the ability of other registries to compete. Counting the two-character combinations of ASCII characters from a-z and 0-9 yields 1,296 registrations and/or renewals annually, which is not likely to stand between success and failure for any registry.\r\n\r\nFurthermore, as the registry operator Who\'s Who Registry is the only company that could realistically offer\r\nthese two-character domains in the .whoswho namespace for registration. That said, the playing field will be equal for all contracted ICANN-approved registrars to provision two-character domain names to their existing clientele/ customer base as well as to new ones they are able to attract through promotion and other means of open competition.\r\n\r\n

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

Neustar is the back-end registry provider for the Who's Who Registry, and handles all domain registrations on behalf of the registry. Neustar handles all documentation and reporting requirements, regardless of whether it is a two-character ASCII domain or a 63 character IDN. No additional vendor or contractor would be required.\r\n

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

Yes, we have communicated with Neustar, back-end service provider, regarding this proposal. We also note that Neustar has a request relating to release of ALL two-character domain names in their .neustar gTLD, which will be a non-public environment. . Further, Neustar currently serves as the registry provider the .biz, .tel, and .travel Top Level Domains (TLDs), for which two-character labels are currently available for registration. No technical issues have arisen in association with the provision of two-character labels. Neustar is an experienced provider when it comes to the provision of two-character labels. \r\n

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

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No\r\n

Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

No\r\n

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of reponses to Internet servers or end systems:

The proposed service will not affect the throughput, response time, consistency or coherence of responses to Internet\r\nservers or end systems in any perceptible way or, in any case, no greater that the difference between a one-character domain registration and a three-character domain registration, which are both permitted under the new gTLD Registry Agreement.\r\n\r\n

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

No technical concerns whatsoever have been raised about the proposed service.\r\n

Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

Our proposal to allow for the release of all two-character ASCII labels does not raise any intellectual property concerns that are not inherent in a domain string of any other length. Who's Who Registry will apply all mandatory ICANN Rights Protection mechanisms upon the release of any two-character labels.\r\n

Does the proposed service contain intellectual property exclusive to your gTLD registry?:

No\r\n

List Disclaimers provided to potential customers regarding the Proposed Service:

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None\r\n

Any other relevant information to include with this request:

The Wikipedia entry on \"Single-letter second-level domain\" is most enlightening and includes voluminous\r\ncitations of 117 BIG NAME companies with two-character domains in the .com gTLD; ten BIG COMPANIES with two-character domains in the other cc and gTLDs; and six with alphanumeric two-character domains. \r\n\r\nWhile many could come up with ten or twelve such names if pressed, it\'s amazing to see the extent of the list in combination with the renown of the registrants (although it does not merit copying in full here).\r\nSee: http://en.wikipedia.org/wiki/Single-letter_second-level_domain\r\n\r\n