

# China Organizational Name Administration Center

## Comments to the Second Draft Application Guidebook

### String Confusion

Chapter 2.1.1 *String Confusion Objection* adds unfavorable items to all IDN gTLD applicants. Such category of objection is not limited to visual similarity. Rather, confusion based on any type of similarity, including visual, aural, or similarity of meaning may be claimed by an objector. Based on this, the existing TLD operators are encouraged to “safeguard” their rights of holding all language versions of their TLDs.

Taking these facts into consideration, we hold that if meaning similarity is applied to IDN gTLD string review, it will result in definite disaster. Existing ASCII TLD operators will easily block all other IDN applications relying on “meaning similarity theory”. As is expected by ICANN, new ASCII TLD may exceed 300 in the future. In that case, all these ASCII TLDs will never have corresponding IDN version applicable for in other languages out of those potential operators who have priority to own the right to run those ASCII TLDs in every language, which demonstrates obvious impartiality to IDN users’ community and operates against ICANN’s pursuit of encouraging competition and respecting diversified cultures. To conclude, we believe that the restriction mentioned above should only apply to TLD application in the same language string by no means of transcending languages as obstacle in IDN application.

### Selection of Expert Panel

In Chapter 3.3.4 *Selection of Expert Panel*, at the aspect of choosing experts dissolving disputes, we suggest to have at least one expert from the corresponding language community while processing the individual IDN TLD applications.

### Getting Approval from the Largest IDN User Community

We hope that ICANN be able to request every IDN TLD applicants an official authentication statement from its government which having the largest user group. In order to protect the IDN group’s interests at the best scale, the statement should be an effective and supportive document for ICANN on evaluating the registrant competition capability.

### Three Character/Letter TLD Limitations

We feel quite regretful that ICANN did not modify the limitation about “three characters TLD” in the second version of Guidebook. We strongly recommend that ICANN be able to consider sufficiently about the feature of Chinese language and pay more attention on this issue at next version of the book.

Thank You.