



## **New gTLDs - Applicant Guidebook April 2011 Discussion Draft**

### Comments from UNINETT Norid AS on Module 2

UNINETT Norid AS, the registry for the Norwegian ccTLD .no, thanks ICANN for the extensive work being done and the opportunity to give input once again. We appreciate the difficulties ICANN are facing while trying to bring together various views of the constituencies in a balanced manner. The guidebook has gone through a very positive evolution, and we thank ICANN for their willingness to listen.

We are especially pleased to see that the post delegation procedure for geographical names now seems to be in place. The wording in both the text in the guidebook itself, 2.2.1.4.3 Documentation Requirements and in the attachment to Module 2 - Sample letter of Government Support - "ICANN will comply with a legally binding order from a court in the jurisdiction of government/public authority" - will together with the changed wording in the New gTLD Registry Agreement 7.13, make it possible for governments/public authorities to give their support. It is absolutely necessary that this agreement make it clear that ICANN will respect any order from a court of competent jurisdiction.

As for the treatment of country and territory names, we are pleased that they still are taken out of the new gTLD program. Even if it is stated that this applies only for *this application round* (page 2-14), we take it for granted that this will apply until the ccNSO Study Group on Country & Territory Names has completed their work. As you are aware, this evaluation was removed from the ccPDP on IDN, as country and territory names include both Latin and non-Latin names.

Regards,

UNINETT Norid AS