

**From:** Mark Carvell  
**Reply-To:** Mark Carvell  
**Date:** Wednesday, February 27, 2013 12:53 AM  
**To:** Bart  
**Cc:** Mark CARVELL, Peter.Littlefair  
**Subject:** ccNSO Policy Development Process on IDN ccTLDs

Dear Bart,

I submit the following UK government comments in response to the public consultation on IDN ccTLDs.

The current policy appears to restrict the sovereign rights of states to establish a ccTLD in any script by requiring that only countries can introduce IDN ccTLDs if the script relates to a language which is an officially designated and recognised language of the country or territory concerned. This requirement is set out in section D on p.8 of the consultation document.

It remains a national decision as to whether such an IDN ccTLD would bring value to a country's social and economic interests and there are circumstances where a government or a community of stakeholders within its jurisdiction might consider that an IDN ccTLD would be beneficial in social and economic terms.

For example, countries like the UK which are strongly multi-cultural with a range of ethnic communities may wish to foster online communication for ethnic minority groups within the country which are more accustomed to using non-ASCII scripts.

It may also be the case that the country's business community may wish to undertake significant levels of trade and investment in another country which uses non-ASCII scripts for its principal language or languages.

Furthermore, the business community could find itself disadvantaged in the overseas market in comparison with the domestic suppliers in that market if the ability to acquire a domain name in an IDN of that country were constrained for any reason associated with the IDN ccTLD registry's policy. This could even create trade policy implications for that country.

While I recognise it might be possible that IDN gTLDs address users' needs in these situations, business users in particular might well consider an IDN ccTLD to be a more attractive option for a website address or online communication (including online transactions) in that it serves to emphasise the national origin.

In summary, the UK does not agree that a country's right to express its name in the scripts of its choice should be constrained in any way with regard to its ccTLD and therefore recommends reconsideration of the requirement in Section D.

With best regards

Mark Carvell  
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