

**ICANN Request for Comment:  
Introduction of Two-Character Domain Names in the new gTLD Namespace**

FairWinds Partners hereby submits comments in response to ICANN's request for comments entitled, "Introduction of Two-Character Domain Names in the new gTLD Namespace." FairWinds Partners appreciates the opportunity to participate in the open dialogue and comment process on the potential introduction of two-character domain names in the new gTLD Namespace. FairWinds Partners supports the introduction of these domain names where they do not conflict with a country code or government operator.

Specifically, FairWinds Partners supports the proposed amendments to the Registry Agreements to implement a new registry service, which would permit the introduction of two-character domain names for registration in the new gTLD namespace resulting from the Registry Services Evaluation Process (RSEP) requests submitted by several registries.

This gives opportunities for applicants to have tailored segmented domains for consumers and visitors. There is interest from the community to have this opportunity and this poses no risk of confusion with any country-code and government or corresponding country code operator. It has been noted that this change will not affect the safety and security of the system. We believe this is an enhancement which supports the goals and growth of the Internet sphere. We recognize that the protection and enhancement of an intellectual property framework is integral and this would not conflict with the Rights Protection Mechanism requirement document.

In summary, FairWinds Partners supports the introduction of these two character domain names where there are no current conflicts with the country-codes or government operator.

Respectfully submitted,  
FairWinds Partners