



20 Jul 2009

Draft Applicant Guidebook: Analysis and Excerpts

Please accept the following comments in response to the publication of ICANN's Draft Applicant Guidebook: Analysis and Excerpts.¹ Go Daddy reserves the right to future comments on this issue, and our positions include, but are not necessarily limited to those noted herein.

Introduction

On balance, GoDaddy.com either supports or has no strong opinion on many of the modifications, analyses, and excerpts published by ICANN. There are, however, a few areas in specific modules which present concerns, and these are outlined below

Module 2: Geographic Names

Section 2.1.1.4.1 dramatically expands the definition of strings considered geographical names. In particular, item (a), reads:

a. *it [string] is an alpha-3 code listed in the ISO 3166-1 standard.*

GoDaddy.com opposes the inclusion of ISO 3166-1 alpha-3 codes² in the definition of geographical names for two primary reasons. First, the alpha-3 codes are not as widely used or recognized as country or territorial abbreviations, as compared to the related alpha-2 codes. Most international users, and even many residents of a given country or territory, often do not associate the alpha-3 code with that country.

Furthermore, reserving alpha-3 codes as geographic names will potentially collide with many well-known (and often unrelated) companies, organizations, and entities that use the identical string as an acronym, abbreviation, or ticker symbol, and may wish to use them as gTLDs. Examples of this type of collision include:

<u>String</u>	<u>Country / Territory</u>	<u>Company / Organization</u>
MAC	Macao	Apple, Inc.
SUN	Former USSR	Sun Microsystems, Inc.
MDA	Rep. of Moldova	Muscular Dystrophy Assoc. (and several other registered marks)

And other strings contained in the alpha-3 list would be significantly more recognizable as potential top-level domains than the countries they represent, for example:

<u>String</u>	<u>Country / Territory</u>	<u>Potential gTLD</u>
GEO	Georgia	Geographic Names
IND	India	Independent
LBR	Liberia	Library or Library Sciences

Conclusions

We look forward to a further dialogue on the issues raised in this document, and welcome the opportunity to help ICANN finalize the Draft Applicant Guidebook.

Sincerely,
GoDaddy.com, Inc.



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1. <http://www.icann.org/en/announcements/announcement-2-31may09-en.htm>
2. http://en.wikipedia.org/wiki/ISO_3166-1_alpha-3