

Non-Commercial Stakeholder Group Minority Position on the Protection of IGO and INGO Identifiers in All gTLDs Policy Development Process

STATUS OF THIS DOCUMENT

This is the Minority Position Statement for Final Report on the Protection of IGO and INGO Identifiers in all gTLDs, prepared by the Non-Commercial Stakeholder Group (NCSG).

On reserved names:

There appears to be a consensus in the IGO-INGO WG to provide special protections for IGOs, INGO, the RCRC and even the IOC at the second level. While we believe this is unfortunate, it does seem to be the accepted. This means that the reserved names list will grow exponentially by 1 or possibly 2 orders of magnitude.

Buried within this increase in the size of the reserved name list is the recommendation for an exemption that would allow for these reserved names to be registered under some circumstances, such as by the organization to whom it is related or by someone who gets permission to register from the relevant IGO or IGNO.

We believe that this notion of an exemption is a fertile ground for abuse that has not been adequately studied by this working group; we admit such a discussion is difficult. I also believe that any such exemption procedure essentially creates a new kind of reserved name that has not been adequately understood and for which there are no policy recommendations on how it should be implemented.

Our minority opinion is that exceptions for the registration of the reserved names be postponed until such time as there has been a PDP on reserved names and the process by which exceptions might be made. In the meantime, our minority recommendation is that these names be treated as names currently on the reserved names are treated, i.e. the only way for such names to be registered as domain names, at the second level is through the Registry Service Evaluation Process (RSEP) process.

On the treatment of reserved names already registered by incumbent registries:

The recommendations extend the expanded reserved names list to the incumbent registries. Quite reasonably registrants who already have these names will be allowed to keep them and for any abuse to be handled under the enhanced RPMs as recommended by WG. Our minority view extends to what happens when the registrant of such a reserved names wishes to sell or otherwise

transfer the name to another registrant. Allowing such a transfer goes against the nature of the reserved names list and opens an avenue for abuse.

Our recommendation is that all names added to the reserved names list be blocked from sale/transfer to a new registrant at least until such time as a PDP on reserved names has considered the issue in the light of their possible changes to the nature of reserved names.