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Dear Sirs

## COMMENTS ON DRAFT RFP

Demys Limited thanks the ICANN Board and Staff for the opportunity to comment on the draft New gTLD Applicant Guidebook.

The present comments relate to applications for new gTLD strings which may correspond with or approximate to a sub-national place name listed in the ISO 3166-2 standard. As such, we shall endeavour to file this posting in the comments forum relative to the Full Draft Applicant Guidebook and separately in the forum relative to Module 2 (Evaluation Procedures).

Demys requests that ICANN provide further clarification in the Guidebook and the relative Explanatory Memorandum "Geographical Names Process" as to the test to be applied by ICANN and/or the Geographical Names Panel (GNP) to determine whether a string is a sub-national place name on the basis that there appears to be some ambiguity as follows:-

First, Section 2.1.1.4.1 of the draft Applicant Guidebook indicates that the test is whether a string 'represents' a sub-national place name as listed in the ISO 3166-2 standard. The term 'represents' is not defined in the Guidebook and clarification is sought as to whether this means an exact match with ISO 3166-2 or something less rigid. If the meaning is less rigid then some further definition would be desirable. This is particularly important for commonly accepted abbreviations of sub-national place names. For example would '.lancs', a term not found in ISO 3166-2, be held as a geographic name on the grounds that this 'represents' Lancashire, a term which is in ISO 3166-2 (under code GB-LAN)? If 'represents' means exact match then lancs is not a geographic term. However, Lancs is a commonly-accepted abbreviation for Lancashire so that on a less rigid test it might be held to 'represent' Lancashire. How will this be handled in practice?

Secondly, Section 2.1.1.4.2 of the draft Applicant Guidebook appears to indicate at paragraph 2, first bullet point, and at paragraph 3, that the geographic name test for all strings is one of 'meaningful representation', whereas in Section 2.1.1.4.1 'meaningful representation' is the test for ISO 3166-1 country or territory names only and is not applied to ISO3166-2 sub-national place names.

This question is extremely important to those prospective applicants who consider that their chosen string may be similar to a geographic term in ISO 3166-2, particularly in light of Section 2.1.1.4.2 paragraph 4 which states that applications which are determined to be geographical but without supporting documents will be considered incomplete and will not pass Initial Evaluation.

Yours faithfully,

**Andrew DS Lothian**  
**Chief Executive**