

Comments of the Government of Brazil to the Release of Country and Territory Names within the .SOFTBANK, .ART and .CARAVAN TLDs

1. In the context of the public comment period related to the "Release of Country and Territory Names within the .SOFTBANK, .ART and .CARAVAN Top Level Domains", the Government of Brazil expresses its disagreement with the proposed amendments to Section 4 of Specification 5 of the Registry Agreement.
2. The Brazilian Government understands that the proposed amendments would undermine the prerogative of governments in public policy matters related to the registration of country and territory names in domain names.
3. The Brazilian government holds the view that the current language in the Registry Agreement is suitable to address both commercial and public policy concerns, as it calls for coordination between governments and registry operators with respect to the release of individual country and territory names at all levels.
4. In eliminating the need for registry operators to reach agreement with respective governments with respect to the release of their respective country and territory names, the proposed amendments represent a step back and neglect the principles of dialogue and accord that should prevail in ICANN's policy making processes.