



Ministero dello Sviluppo Economico

Istituto Superiore delle Comunicazioni e delle Tecnologie dell'Informazione

Italian Comments on the Proposed Measures for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes

Please find the following comments regarding the measures proposed by ICANN for Letter/Letter Two-Character ASCII Labels to Avoid Confusion with Corresponding Country Codes.

Italy has always been quite sensible to the issue of the release of our country code “.it” as a Second Level Domain.

We would like to recall that both the Singapore (2015) and Dublin GAC Communiqué advised the Board that comments submitted by the relevant Governments shall be fully considered regardless of the grounds for objection.

The Singapore advice was accepted by the Board. The Board Resolution 2015.02.12.16 (<https://www.icann.org/resources/board-material/resolutions-2015-02-12-en#2.a>) states:

...the Board accepts the advice of the GAC from the 11 February 2015 GAC Communiqué regarding the release of two-letter codes at the second level in gTLDs. The Board directs the President and CEO, or his designee(s), to revise the Authorization Process for Release of Two-Character ASCII Labels and proceed immediately as follows:

Implement improvements to the process to alert relevant governments when requests are initiated. Comments from relevant governments will be fully considered.....

Furthermore, in the Helsinki Communiqué the GAC advises the Board *to urge the relevant Registry or the Registrar to engage with the relevant GAC members when a risk is identified in order to come to an agreement on how to manage it or to have a third-party assessment of the situation if the name is already registered.*

We don't believe that the ICANN proposal is in line with the abovementioned framework. For that reason, we don't support the proposal because it would force governments or ccTLD managers to buy every ccSLD whose delegation they don't agree with.

After consultation with the Italian ccTLD manager, we ask ICANN to keep the reservation of the two character label strings specified in the ISO 3166-1 alpha-2 standard. ICANN could release those strings

only if the Registry Operator reaches a formal agreement with the related government/country-code manager.

Moreover, we believe that every mitigation plan proposed to avoid confusion with the corresponding country code, should be subjected to the approval by ICANN **only after being approved by the respective government/ccTLD manager.**

Yours sincerely,

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ITALY