

Ciudad de México, a 17 de Agosto de 2016

COMMENTS OF THE MEXICAN ADMINISTRATIONS TO THE DOCUMENT “PROPOSED
MEASURES FOR LETTER/LETTER TWO-CHARACTER ASCII LABELS TO AVOID CONFUSION
WITH CORRESPONDING COUNTRY CODES.”

Mexico considers that the proposed measures are not enough to avoid confusion with corresponding country codes. In contrast, we believe that the release of country codes in the Second Level Domain (SLD) could destabilize the domain name system.

Regarding the proposed measures, Mexico considers the following:

- To maintain the exclusivity of a country code for a 30-day period in favor of the related government does not necessarily contribute to consumer choice or competitiveness. Besides, it could produce additional costs to governments or country code managers who wish to obtain a country code under a new gTLD.
- Likewise, it will require additional efforts and resources to review each new policy that every new gTLD operator publishes.

Mexico considers that the protection of the country codes in the ISO-3166 list should not be released. Having the offer to register a country code as a SLD would foster combinations of domain name registrations in the third level of new gTLDs. This does not contribute to the objective of this round for new gTLDs, in which it sought to increase the available options only at the root level, taking into account that other options of registration already were available and covered by other top level domains (TLDs).

It is worth noting that the initial conception of the DNS, sought to foster the registration of new domain names with a specific orientation of diverse nature: some community-territorial, some other with technical or network orientation, military, commercial, among others¹, and the new gTLDs were equally conceived in this sense.

Based on the principle of parsimony, which implicates that entities should not multiply needlessly and should use the available resources; given the existence of ccTLD, which purpose is the identification of a country or community, there would be no need to have it in the SLD under new gTLDs.

¹ See Postel, J. (1994). RFC1591, available on: <https://www.ietf.org/rfc/rfc1591.txt> , among other reference documents.