

Rosario, September 25th 2018

To Whom It May Concern,

The Latin American and the Caribbean ccTLD Organization (LACTLD), is a nonprofit association created on August 20th, 1998 in Buenos Aires, Argentina, during the International Forum on the White Paper (IFWP). LACTLD's vision is to be the regional organization that represents the interests and promotes the development of the ccTLDs in Latin America and the Caribbean. Following, is LACTLD's input with respect to the Initial Report of the New gTLD Subsequent Procedures Policy Development Process Working Group, which is chartered to evaluate what changes or additions need to be made to existing new gTLD policy recommendations and includes materials from the full Working Group and four sub-teams within the Working Group, Work Tracks 1-4.

In reference to the Initial Report following questions: "2.7.1.e.2: If there are no technical obstacles to the use of 2-character strings at the top level consisting of one letter and one digit (or digits more generally), should the reservation of those strings be removed? Why or why not? Do you believe that any additional analysis is needed to ensure that these types of strings will not pose harm or risk to security and stability? Please explain."

LACTLD states that:

1. In order to assess if there are no technical obstacles to the use of 2-character strings at the top level consisting of one letter and one digit, this

question should be addressed by DNS technical experts (such as ICANN's Security and Stability Advisory Committee (SSAC)).

2. In reference to the question: If there are no technical obstacles to the use of two-character strings consisting of one letter and one digit, should they be permitted to be registered in future gTLD string application rounds?, LACTLD believes that two-character strings consisting of one letter and one digit should NOT be permitted to be registered in future gTLD applications for the following reasons:

a. Two-character top-level domains are firmly associated with country-code Top Level domains; ccTLDs are created by IANA/PTI from two character codes laid down in ISO 3166-1

– ccTLDs have an entirely different policy background to gTLDs. It is entirely foreseeable that the ISO Maintenance Agency could, in the future, decide to issue two character country codes

including digits, as the ITU already has done: see Appendix 2 to ITU Radio Regulations (e.g., '4X' for Israel, '2' for the UK).

b. Homographic issues:

Homographic issues were not addressed by the GNSO.

Homographic issues pose a direct threat to the security and stability of the Internet's system of unique identifiers, including ccTLDs that might be caught up in them; some examples are:

.ci -> .c1

.cl -> .c1

.co -> .c0

.do -> .d0

.nl -> .n1

.is -> .1s

.ls -> .1s

With sans-serif typefaces, there is considerable risk for consumer confusion and consequent security risks, including phishing attacks.

ICANN's core mission is "...to coordinate the stable operation of the Internet's unique identifier systems.". The introduction of homonym-conflicted two-character top-level domains would be in direct conflict with that core mission.

The GNSO's proposal would introduce instability to the DNS via visual confusion of strings.

3. In reference to the questions :

Is additional analysis needed to ensure that the introduction of two-character strings consisting of one letter and one digit will not cause harm or risk to the security and stability of the DNS?

LACTLD states that as per Question 1, this must be addressed by DNS Technical Experts, such as the Security and Stability Advisory Committee (SSAC).

In conclusion, LACTLD believes that the technical questions asked by the GNSO Working Group need to be addressed and answered by relevant technical bodies, two-character strings, consisting of one letter and one digit, or two digits, should unequivocally not ever be permitted in future gTLD application rounds because of the conflict with ccTLD allocation policy and ISO two-character codes (which are external to ICANN), as well as the homographic issues discussed above.