APTLD Statement on Country and Territory Designations as Top-Level Domains

As we noted in our APTLD72 Communique and Statement dated 18 September 2017, we expressed our awareness of continuing efforts to register designated countries and territories as gTLDs. As noted in the Communique from APTLD72, the APTLD expressly stated its support for the continuation of the status-quo regarding country and territory designators as top-level domains, i.e.:

- ■ all 2-letter ASCII codes, whether or not in the ISO 3166 alpha-2 list, are reserved for ccTLDs,
- ■ all 3-letter ASCII codes in the ISO 3166 alpha-3 list are reserved and cannot be applied for, and
- ■ any string in the Reserved Country and Territory Names lists referred to in the ICANN document https://www.icann.org/resources/country-territory-names/#reserved would not be delegated as a gTLD.

We re-affirm this position taken at APTLD72, as expressed in our Communique issued at the conclusion of that meeting.

Yet despite our statement on Country and Territory designations as Top-Level Domains issued at APTLD72, we note a continuing effort, as expressed in the "Initial Report on the New gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4)", currently published for public review by ICANN (https://gnso.icann.org/sites/default/files/file/field-file-attach/subsequent-procedures-initial-overarching-issues-work-tracks-1-4-03jul18-en.pdf), to seek permission for 2 character domain names as gTLDs, so long as one of the characters is a numeric digit (see https://gnso.icann.org/sites/default/files/file/field-file-attach/subsequent-procedures-initial-annex-c-02jul18-en.pdf page 273, Question 2.7.1.e.2).

The APTLD Membership categorically rejects this proposal for the following reasons:
1. As we noted in our APTLD72 Communique, all 2-letter ASCII codes, whether or not in the ISO 3166 alpha-2 list, have historically been reserved for ccTLDs.
2. As the widely circulated "White Paper on the GNSO proposal regarding two-character top-level domains" argues, it is entirely possible that the ISO 3166 Maintenance Agency may, at some point in the future, begin to assign 2-character alpha-numeric strings as Country and Territory code points.
3. Depending upon the type face employed, introduction of 2-character strings containing a digit may well cause visual confusion for the internet-user, thus leading to security issues within the DNS.
4. In addition, we would like to stress that creating 2-letter ASCII TLDs (regardless of inclusion of numeric characters or not) would crack a solidly established notion among Internet users that "all ASCII ccTLD identifiers are two letters long, and all two-letter top-level domains are ccTLDs" (https://en.wikipedia.org/wiki/Country_code_top-level_domain).