



# ICANN Registry Request Service

Ticket ID: V9H4W-5Q0Q9

Registry Name: Telnic Ltd.

gTLD: .tel

Status: ICANN Review

Status Date: 2010-08-11 12:49:28

Print Date: 2010-08-11 12:49:33

## Proposed Service

Name of Proposed Service:

*Proposal to allow allocation of one- and two- character ASCII .tel domain names*

Technical description of Proposed Service:

*Appendix 6 of the Registry Agreement between Telnic and ICANN (located at <http://www.icann.org/en/tlds/agreements/tel/appendix-6-07apr06.htm>) contains a provision that requires keeping all one- and two- ASCII character names reserved on the second level. It also provides that Telnic may propose that ICANN release the reservations on two-character names if Telnic implements measures to avoid confusion with the corresponding country codes.*

*Telnic proposes making certain one- and two-character ASCII names available for registration pursuant to the implementation plan described below.*

*Some of the one- and two-character second-level labels will remain reserved, namely:*

*- labels consisting purely of one digit or of two digits, and*

*- labels that correspond to an existing Country Code Top Level Domain, according to the IANA Root Zone Database. These names, as established in the Registry Agreement, may be further released pursuant to an agreement with the corresponding government and country-code TLD manager, or the ISO 3166 maintenance agency, whichever appropriate.*

*Note: presently, a ccTLD exists for every two-character country code found on the ISO-3166 list. There are also ccTLDs (such as .uk) that do not have a corresponding ISO-3166 code. Telnic will not limit its reserved list to those that have a corresponding ISO-3166 code.*

## Consultation

Please describe with specificity your consultations with the community, experts and or others. What were the quantity, nature and content of the consultations?:

*See below*



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a. If the registry is a sponsored TLD, what were the nature and content of these consultations with the sponsored TLD community?:

*We received a number of requests from the existing or prospective .tel holders indicating their intent to register and use a one- or two-character .tel domain name and inquiring when (or if) these domains will become available for registration. Some of these emails are given below (personally identifiable information redacted).*

*-----Original Message-----*

*From: xxxxxxxxxxxxxxx.com [mailto:xxxxxxxxxxxxxx.com]*

*Sent: 23 March 2010 20:25*

*Subject: [website@telnic.org #5841] domain question*

*We have been legally named [XXXX] [Telnic note: the name in question is a composed of two letters followed by "TEL"] since 2007. When looking up two letter domains, it seems to be not allowed. Since we have legal registered the mark of [XXXX] we would like to know how we can go about getting the [XX].tel listing. Thanks.*

*[Name and contact information withheld]*

*----*

*From: XXXXXXXXXXXXXXX.com [mailto:XXXXXXXXXXXX.com]*

*Sent: 07 July 2010 22:56*

*Subject: [website@telnic.org #8034] .tel Domain Creation*

*Hello,*

*I would like to create the following domain names:*

*[Requested two-character names withheld]*

*How would I go about doing this?*

*Thank you,*

*[Name and contact information withheld]*



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b. Were consultations with gTLD registrars or the registrar constituency appropriate? Which registrars were consulted? What were the nature and content of the consultation?:

*Telnic created a poll in the registrar section of its website that solicited opinions on whether 1- and 2- character names should be made available. The overwhelming majority of the registrar members indicated they are in favour of this proposition.*

c. Were consultations with other constituency groups appropriate? Which groups were consulted? What were the nature and content of these consultations?:

*Because similar proposals have already been approved and implemented for other TLDs without substantive objection from any constituency, Telnic does not believe other consultations are necessary.*

d. Were consultations with end users appropriate? Which groups were consulted? What were the nature and content of these consultations?:

*Please see response to question (a) above.*

e. Who would endorse the introduction of this service? What were the nature and content of these consultations?:

*As described above, both the Telnic sponsored community and the ICANN-accredited registrars have voiced their support for the availability of 1- and 2-character names.*

*In addition, a number of other organizations have approved the release of 1- and 2-character names in a broader context. For example, the Reserved Names Working Group, in its May, 2007 final report on issues related to the introduction of new gTLDs (available at <http://gnso.icann.org/issues/new-gtlds/final-report-rn-wg-23may07.htm>), recommended that (i) single character domain names should not be reserved in future gTLDs, (ii) those currently reserved in gTLDs should be released (contingent upon the use of appropriate allocation frameworks), and (iii) registries should be permitted to propose release of 1- and 2-character reservations provided that measures to avoid confusion with any corresponding country codes are implemented.*

*Finally, ICANN itself has approved the release of the restrictions on 2-character or both 1- and 2-character names for a number of other TLDs, including .info, .cat, .pro, .name, .biz and .coop.*



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f. Who would object the introduction of this service? What were(or would be) the nature and content of these consultations?:

*Telnic is not aware of any party that would object to the introduction of this service.*

## Timeline

Please describe the timeline for implementation of the proposed new registry service:

*Telnic intends to make 1- and 2- character names available as soon as operationally feasible after receipt of approval from ICANN.*

## Business Description

Describe how the Proposed Service will be offered:

*Telnic will offer 1- and 2- character domain names in three rounds. Names that are allocated in each of the rounds will be unavailable in subsequent rounds. In addition, names that have been reserved by Telnic (if any) will not be made available in any phase of the allocation process.*

*In the first round Telnic will solicit RFPs (requests for proposals) from interested parties for specific 1- and 2-character names. At the end of the round Telnic will consider the applications submitted, and where the applicant has met the minimum requirements or prevailed over other applicants for the same name based on the criteria mentioned below, Telnic will award the name to the successful applicant. Telnic reserves the right to choose, in its sole discretion, which of the competing proposals to select or to select none. Criteria that we will use in assessing the applications are:*

- Intended use of the domain name*
- Value the applicant may bring to the .tel community*
- Potential to increase awareness of the .tel technology*
- Business reputation of the applicant*
- Applicant's financial commitments*



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*- Objections the specific registration may raise (or lack thereof).*

*In the second round 1- and 2-character domain names that were not allocated in the first round will be made available on a first come, first served basis for a premium price.*

*Both in the first and in the second round, Telnic will initially create temporary domains for all unreserved 1- and 2- character names in the SRS using its own registry holding account with the SRS. For each domain name awarded, Telnic will provide a transfer authorisation code to the registrant so that it can transfer the domain to the registrar of its choice using the usual transfer procedure. Telnic will not provide any other domain management facilities, nor will renewal via Telnic be possible.*

*In the third round all unreserved 1- and 2-character domains that were not allocated during the first two rounds will be removed from the SRS reserved list and made available as normal on a first come, first served basis through all participating registrars.*

*At no time during the process will labels that are subject to reservation criteria specified under "Technical Description" be made available. Also, pursuant to Appendix S to the Registry Agreement, Telnic reserves the right to withhold a small number of premium and special purpose 1- and 2-character .tel names from being allocated and keep them permanently reserved, operated or offered on the most appropriate basis.*

Describe quality assurance plan or testing of Proposed Service:

*Neustar, the registry infrastructure provider for the .tel TLD will follow its own standard quality assurance procedures to effect the required changes in the SRS. In addition, Telnic has a dedicated team of Quality Assurance engineers that will work on the implementation. The specific details of the quality assurance procedures will be developed as part of the operational project plan.*

Please list any relevant RFCs or White Papers on the proposed service and explain how those papers are relevant.:

*- RSTEP Report on GNR's proposal for 2-character domains, advising of the non-existence of any technical concerns:  
<http://www.icann.org/registries/rstep/RSTEP-GNR-proposal-review-team-report.pdf>*

*- GNSO Reserved Names working Group Report recommending the release of single character domains in the existing TLDs. The same paper endorses release of two character domains provided that measures are in place to avoid confusion with country codes:  
<http://gns0.icann.org/issues/new-gtlds/final-report-rn-wg-23may07.htm>*



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- Approved requests to release 1- and/or 2-character names in other TLDs:

<http://www.icann.org/en/registries/rsep/>

## Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

*Appendix 6 of the .tel Registry Agreement "Schedule of Reserved Names" provides as follows:*

*"Except to the extent that ICANN otherwise expressly authorizes in writing, the Registry Operator shall reserve names formed with the following labels from initial (i.e. other than renewal) registration within the TLD:*

*(...)*

*Additional Second-Level Reservations. In addition, the following names shall be reserved at the second level:*

*- All single-character labels.*

*- All two-character labels shall be initially reserved. The reservation of a two-character label string shall be released to the extent that the Registry Operator reaches agreement with the government and country-code manager, or the ISO 3166 maintenance agency, whichever appropriate. The Registry Operator may also propose release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes."*

What effect, if any, will the Proposed Service have on the reporting of data to ICANN:

*None. Additional allocated names will be accounted for in the corresponding reports.*

What effect, if any, will the Proposed Service have on the Whois?:

*The Proposed Service will have no effect on WHOIS. WHOIS service will be provided for 1- and 2- character names as normal.*

## Contract Amendments

Please describe or provide the necessary contractual amendments for the proposed service:



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*Appendix 6 of the Registry Agreement provides that ICANN may, through a written authorization, release any of the restrictions imposed in that document. It also specifically provides that Telnic may request that ICANN release the restrictions on 2-character domains based on Telnic's implementation of measures to avoid confusion with the corresponding country codes. Telnic believes its proposal to continue to restrict registration of domains that correspond to existing ccTLD strings will avoid such confusion. Accordingly, Telnic believes that a written authorization from ICANN to release 1- and 2-character names according to the implementation plan described herein would be sufficient and no amendment to the Registry Agreement would be required.*

## Benefits of Service

Describe the benefits of the Proposed Service:

- Short .tel domains require less key strokes and hence provide benefit for their respective holders enabling them to be contacted significantly faster.*
- Availability of short domains is especially beneficial in the .tel TLD as it is heavily used via mobile devices which often do not offer input methods as convenient as desktop computers do.*
- Release of 1- and 2- character .tel names increases competition among gTLD registry operators.*
- A number of entities, both individuals and businesses, use one or two character designations in good faith as legal names, acronyms, nicknames or trademarks. Providing them with an opportunity to register these designations as .tel domains represents a fair measure allowing these individuals and businesses to be identified on the internet by their names on a par with other entities.*

## Competition

Do you believe your proposed new Registry Service would have any positive or negative effects on competition? If so, please explain.:

*Telnic believes that additionally released .tel domain names will positively affect competition as it addresses the current competitive imbalance where such names are available in some TLDs but not in .tel.*

How would you define the markets in which your proposed Registry Service would compete?:

*Though .tel has a unique mission and sponsored community, it may serve as an alternative to other domain names, both*



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*ccTLDs and gTLDs, especially considering that a number of existing TLDs already offer short domain names.*

What companies/entities provide services or products that are similar in substance or effect to your proposed Registry Service?:

*Registry operators for the following existing gTLDs offer, or have applied for offering, 1- and/or 2- character labels on the second level:*

*.com*

*.net*

*.org*

*.info*

*.biz*

*.mobi*

*.travel*

*.name*

*.pro*

*.coop*

*.cat*

*.jobs*

In view of your status as a registry operator, would the introduction of your proposed Registry Service potentially impair the ability of other companies/entities that provide similar products or services to compete?:

*Telnic does not believe there would be any such impairment.*

Do you propose to work with a vendor or contractor to provide the proposed Registry Service? If so, what is the name of the vendor/contractor, and describe the nature of the services the vendor/contractor would provide.:

*Telnic works with Neustar as the registry infrastructure provider and will continue use its services for the Shared Registry System, DNS, WHOIS and other related services. These will be also utilised for the proposed 1- and 2- character names once they are allocated.*

Have you communicated with any of the entities whose products or services might be affected by the introduction





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of your proposed Registry Service? If so, please describe the communications.:

*Telnic has discussed the possible release of 1- and 2-character names with Neustar and has received no objections.*

Do you have any documents that address the possible effects on competition of your proposed Registry Service? If so, please submit them with your application. (ICANN will keep the documents confidential).:

*Telnic does not have any additional documents.*

## Security and Stability

Does the proposed service alter the storage and input of Registry Data?:

*There will be no change in the storage or input of the registry data.*

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems:

*There will be no effect on the performance of any Internet servers or end systems.*

Have technical concerns been raised about the proposed service, and if so, how do you intend to address those concerns?:

*No technical concerns were raised.*

## Other Issues

Are there any Intellectual Property considerations raised by the Proposed Service:

*Telnic believes that any Intellectual Property considerations raised by the proposed service are addressed by the established and existing processes, including UDRP.*

Does the proposed service contain intellectual property exclusive to your gTLD registry?:



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No.

List Disclaimers provided to potential customers regarding the Proposed Service:

*Telnic does not anticipate that the Proposed Service would require any additional disclaimers beyond those that already exist in the .tel policies and contracts.*

Any other relevant information to include with this request:

No.