



Charleston Road Registry Inc. d/b/a Google Registry (“Google Registry” or “Registry Operator”) proposes to implement the following mechanisms to avoid confusion between the use of two-letter labels in its top level domains (“TLDs”) and the corresponding country codes as defined in the ISO-3166 alpha-2 list. These mechanisms are being proposed in response to the objections filed during the public comment periods associated with Google Registry’s two-letter authorization requests.¹ These confusion avoidance mechanisms are intended to apply to second level domains corresponding to ISO-3166 alpha-2 codes (“ISO-3166 alpha-2 labels”), including, but not limited to, those for which objections were filed during the applicable comment periods.

Google Registry broadly supports the ability for registry operators to release two-letter labels, both on the basis of precedent² and in furtherance of the New gTLD Program’s goals of expanding choice and competition in the domain name marketplace and making domain names more meaningful and useful for consumers.³ Generally, we believe that the likelihood of confusion between two-letter labels used in new gTLDs and country codes is low. Despite two-letter labels, including ISO-3166 alpha-2 labels, having been used in several legacy TLDs for years, no specific instances of confusion have been cited in ICANN comment periods on the subject.

The New gTLD Registry Agreement provides that that “Registry Operator may also propose the release of [two-character] reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN.” We urge ICANN to approve the proposed confusion avoidance measures as the basis for releasing all ISO-3166 alpha-2 labels in the relevant Google Registry TLDs.

The confusion avoidance mechanisms proposed herein refer to the authorization requests that have already been submitted by Google Registry (i.e. .here, .drive, .google, .youtube, .soy, .android, .meet, .goog, .gmail, .みんな, .page, .docs, .chrome, .foo, .play, and .how). Google Registry will not release any of the domain names listed in Annex 1 until ICANN approves this proposal, or another set of confusion-avoidance mechanisms for which Google Registry meets the criteria.

Strategy 1: Avoidance Mechanisms for Google Registry’s .Brand TLDs (.google, .youtube, .android, .gmail, and .chrome)

¹ See Annex 1 listing all of the objections deemed relevant by ICANN.

² See [RSEP requests](#) by .cat, .mobi, .asia, and .pro where no specific confusion mechanisms are proposed, and requests by .coop, .jobs, .travel, and .mobi that include anti-confusion mechanisms.

³ See [Google Registry Reply Comments on Introduction of Two-Character Domain Names in the New gTLD Name Space](#).

To avoid confusion related to the use of any ISO-3166 alpha-2 labels in the .google, .youtube, .android, .gmail, and .chrome TLDs Google Registry will implement a closed registration policy for these TLDs that avoids potential confusion.

To these ends, Google Registry commits to the following:

- Developing and implementing a closed registration policy that requires that all domain names in the TLDs be registered and used by Registry Operator, its Affiliates, or its Trademark Licensees;
- Clearly publishing this registration policy; and
- Ensuring continued compliance with this registration policy, including through annual recertification of compliance with Specification 13.

This publicly available registration policy would prevent entities related to a government or country code operator from registering domains in the .google, .youtube, .android, .gmail, and .chrome TLDs. It would clearly designate to the public that .google, .youtube, .android, .gmail, and .chrome TLDs are proprietary spaces, in which all second-level domains are being operated by Google Registry and its Affiliates and Trademark Licensees. In addition, each of these TLDs represents an internationally famous brand strongly associated with Google Inc. that are unlikely to be confused with any other usage.

Strategy 2: Avoidance Mechanisms for Google Registry’s Code of Conduct Exempt TLDs (.play, .drive, .goog, and .foo)

To avoid confusion related to the use of any ISO-3166 alpha-2 labels in the .play, .drive, .goog, and .foo TLDs, Google Registry will implement a closed registration policy for these TLDs that avoids any potential confusion.

To these ends, Google Registry commits to the following:

- Developing and implementing a closed registration policy that requires that all domain names in the TLDs be registered and used by Google Registry and its Affiliates;
- Clearly publishing this registration policy; and
- Ensuring continued compliance with this registration policy, including through annual recertification of compliance with the Notice of Exemption to the Registry Operator Code of Conduct.

This publicly-available registration policy would prevent entities related to a government or country code operator from registering domains in the .play, .drive, .goog, and .foo TLDs. It would, therefore, clearly designate to the public that the .play, .drive, .goog, and .foo TLDs are proprietary spaces, in which all second level domains are being operated by Google Registry and its Affiliates.

Strategy 3: Avoidance Mechanisms for Google Registry’s Open TLDs (.here, .soy, .meet, .みんな, .page, .docs, and .how)

To avoid confusion associated with the use of any ISO-3166 alpha-2 labels in the .here, .soy, .meet, .みんな, .page, .docs, and .how, Google Registry will commit to:

- Prohibit registrants of ISO-3166 alpha-2 labels from selling third level domains under those labels to third parties;⁴
- Investigate any reports of misuse (including misleading or deceptive conduct), including those filed by the governments referenced in Annex 1;
- Provide a written response to any allegations of misuse; and
- Where, in Google Registry’s sole discretion, misuse has occurred that creates confusion with the relevant country code, undertake measures mitigate the confusion.

If, in response to a report by one of the governments referenced in Annex 1, Google Registry determines that misuse has occurred that creates confusion with a country code, Google Registry will first work indirectly with the sponsoring registrar and/or directly with the registrant to mitigate confusion. Where, in Google Registry’s sole discretion, the registrant has failed to mitigate the confusion, Google Registry may, in its sole discretion, undertake direct action to mitigate the confusion up to and including suspension of the domain name.

Similarly, if Google Registry is made aware that a registrant in one of its open TLDs is selling third level domains under an ISO-3166 alpha-2 label it will first work indirectly with the sponsoring registrar and/or directly with the registrant to halt this practice. Where there registrant fails to halt this practice Google Registry may, in its sole discretion, undertake enforcement action up to and including suspension of the domain name.

⁴ Registrants would still retain the ability to create and use third level domains, provided that they were not being sold to third parties.

Annex 1

TLD	Objected Labels	Relevant Governments	Mitigation Plan
.here	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3
.drive	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 2
.google	ci, cn, eg, il, in, it, me, pt, sg	Cote D'Ivoire, China, Egypt, Israel, India, Italy, Montenegro, Portugal, and Singapore	Strategy 1
.youtube	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 1
.soy	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3
.android	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 1
.play	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 2
.meet	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3
.goog	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 2
.gmail	ai, bh, bm, ci, cn, eg, il, in, io,	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands,	Strategy 1

	it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	
.みんな	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3
.page	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3
.docs	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy3
.chrome	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 1
.foo	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 2
.how	ai, bh, bm, ci, cn, eg, il, in, io, it, kr, ky, me, ms, pt, ru, sg, sh, su, tc, tw	Anguilla, Bahrain, Bermuda, Cote D'Ivoire, China, Egypt, Israel, India, Indian Ocean, Italy, Korea, Cayman Islands, Montenegro, Montserrat, Portugal, Russian Federation, Singapore, Saint Helena, Turks and Caicos, and Taiwan	Strategy 3