

**Comments of the Internet Committee
of the International Trademark Association
on the ccNSO's IDN Country Code PDP WG draft Topic Paper**

Introduction

The Internet Committee of the International Trademark Association (INTA) welcomes the opportunity to provide comments to the ccNSO's IDN Country Code PDP WG on topics and issues that need to be addressed by a global policy for the selection and delegation of IDN ccTLDs.

Suggestions

The Committee suggests that the following issues be covered in any global policy for the selection and delegation of IDN ccTLDs:

1. How will the system deal with possible string confusion issues? How will transliterations of strings be treated? Will these be regarded as variants?
2. Who will be entitled to operate IDN ccTLDs outside the fast track process? What criteria will they need to satisfy? What mechanisms will be put in place to vet potential Registry operators?
3. The relationship between ICANN and any IDN ccTLD operator should be fully documented and based upon a uniform agreement applicable to all IDN ccTLD operators.
4. Each IDN ccTLD Registry should maintain full and accurate WHOIS records. To the extent an IDN ccTLD registry operator believes it is legally prevented by local/national privacy laws or regulations from collecting, display, and distributing personal data via WHOIS, the IDN ccTLD registry operator should follow the [ICANN Procedure For Handling WHOIS Conflicts with Privacy Law](#) .
5. IDN ccTLD operators should be obliged to implement a Dispute Resolution System (DRS) that is fair and reasonable. We would suggest that the Nominet www.nominet.org.uk DRS procedure is used as a model for the resolution of disputes.
6. The identity of the operator members of each ccTLD Registry should be publicly available and the governance and operating procedures of the Registry should be open, accountable and transparent.
7. The IDN ccTLD should have proper financial controls in place to make it safe from financial shocks or other security issues.

8. Ongoing review and updates of a number (but not all) of the criteria, mechanisms and processes is contemplated in the issues paper. Who will be responsible for setting the scope of and timing for any review? We recommend a set timeframe for the review of the entire policy after implementation.

Thank you for considering our views on these important issues. Should you have any questions regarding our submission, please contact External Relations Manager, Claudio DiGangi at: cdigangi@inta.org

ABOUT INTA

The International Trademark Association (INTA) is a 131-year-old not-for-profit organization with more than 5,600 member organizations in more than 190 countries. INTA is dedicated to supporting the essential role that trademarks play in promoting effective national and international commerce, protecting the interest of consumers, and encouraging free and fair competition. During the last decade, INTA has served as a leading voice of trademark owners in the development of cyberspace, including as a founding member of ICANN's Intellectual Property Constituency (IPC).