



# ICANN Registry Request Service

Ticket ID: F9S0L-7I6P6

Registry Name: Monash University

gTLD: .MONASH

Status: ICANN Review

Status Date: 2014-10-22 15:23:58

Print Date: 2014-10-22 15:31:20

## Proposed Service

Name of Proposed Service:

*Two-Character Label Release*

Technical description of Proposed Service:

*Pursuant to Section 2 of Specification 5 of the Registry Agreement, Monash University request to commence the procedure for the release of two-character labels for registration in the .monash TLD: based upon the implementation of measures to avoid confusion with country code TLDs. Once these labels become available for registration they would be subject to all registration policies established for the .monash TLD including, but not limited to, the Registration Policy and our Acceptable Use Policy set forth at [www.nic.monash](http://www.nic.monash). The use of two-character labels at the second level as planned by the .monash TLD will not cause confusion with country-code TLDs. Monash University is a long-standing and reputable education institution in Australia, and it is our intention to use our abbreviated name of Monash as our online identify and provide the most efficient user experience for our end-users. As the two-character labels will be used at the left of the <dot> and not the right of the <dot> we do not logically see how there could be any significant user confusion with corresponding country code Top Level Domains. In addition, given that the .monash TLD is a Brand registry as defined by Specification 13 of our Registry Agreement, the use of second-level domains in the .monash TLD will be closely controlled and monitored. This request does not constitute a material change to the Registry Agreement because this extension to the TLD is contemplated within Section 2 of Specification 5 of the existing Registry Agreement, provided approval by ICANN is obtained.*

## Consultation

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

*Monash University has undertaken a number of inter-departmental and external strategy sessions with domain name industry consultants to determine how to provide the best user experience for our students, administrators and other potential end-users. Monash is a well-known brand within the education community globally and we believe that the addition of short, abbreviated and easy to remember second level domains will ultimately provide effortless access to the .monash TLD for our end-users. Therefore, access to all two character labels is important to our overall strategy for a successful TLD. Prior to the delegation of the .monash TLD, Monash University hosted most of its content under monash.edu. We are currently in the process of managing a strategy of allowing the two TLDs to co-exist while we transform the .monash TLDs digital space. One of the vital resources available to students and administrators alike is a single point of access for information, services and resources at Monash University at [my.monash.edu](http://my.monash.edu). In order to maximize the value of this space we intend to migrate the*



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*information to my.monash and to this end we have, through an intermediary, sought agreement from the Malaysian government GAC representative and ccTLD manager to use "my" in this manner. This request was denied on the basis that "my" appears on the Alternate Path to Delegation blocked names list for the .monash TLD and the Malaysian government GAC representative and ccTLD manager requested that the "... status quo wish is for "my" to remain blocked at the second level for the .monash TLD." As the Name Collision Framework has now provided an avenue to release the blocked names following a controlled interruption period we believe it is appropriate to request the release of "my" at the second level as part of the RSEP process and in the context of seeking the release and use of all two character labels.*

*Monash University has paid close attention to discussions within the GAC and the ccNSO on the issue of releasing two-character labels, specifically as it relates to two character labels that are also two-letter country codes as identified on the ISO 3166-1 list. During a session on this issue in London, the ccNSO was unable to come to any consensus opinion. The GAC also has no consensus view on this issue as stated in Minutes from the GAC meeting in Singapore: "GAC considered further the Brand Registry Group proposal for the approval of country names and 2-letter and character codes at the second level. The approach of GAC members on a national basis to this matter varies. Members suggested consideration be given to establishing a register of countries that do not require individual requests to be made. While GAC does not see any role for itself at the operational level, individual members can assist with proposals relevant to their particular country if requested." We understand that the GAC intends to have further discussions on this issue during the ICANN meeting in Los Angeles in October.*

*We also note that the ALAC has provided comments on a number of RSEPs seeking the release of two-character labels and support the use of two-character labels at the second level regardless of their connection to the ISO 3166-1 list. Specifically the ALAC notes "... shorter domains are more desirable to potential registrants and two-character ASCII labels can be used for alternative meanings than the one for the ISO 3166-1 alpha-2 standard. For these reasons, absent any DNS-related security or stability issues, the ALAC believes that all the restrictions of two character ASCII labels at the 2nd level within a TLD should ultimately be removed ..."*

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

*Not applicable.*

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

*Direct consultations were not conducted with the RySG or RrSGs on this matter; however, the existence of a number of RSEPs by an increasing number of new gTLD registry operators indicates the value of two character labels to the business operations of new gTLDs. It also should be highlighted that all that is being sought is parity with existing ccTLD and gTLD operators who already have the flexibility to offer all two character labels at the second level of their TLD. We note that the operation of two character labels at the second level of these TLDs have not cause any confusion or security and stability*



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issues.

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

*Monash University has not undertaken direct consultations with others, however we are aware that this issue has been the subject of discussion among the ccNSO, ALAC and the GAC (as outlined previously).*

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

*The .monash TLD is a closed registry and an applicant for Specification 13 of the Registry Agreement. While no consultations were undertaken with end users; as previously mentioned internal and external strategy sessions have been undertaken. The use of two character labels in the .monash TLD is important to ensuring flexibility in the delivery of our products and services. The flexibility to use two numbers (eg. 11), one number and one character (eg. A1) and two character labels contained on the ISO 3166-1 list (eg. "it" which is globally recognized as the acronym for Information Technology as well as the country code for Italy; along with the words "my", "at", "me", "to" that also appear on the ISO-3166-1 list), will greatly enhance our end user experience.*

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

*We believe that all users of the .monash TLD would endorse the introduction of two character labels in the TLD because of the benefits associated with shorter and easy to remember second level domains combined with a reputable TLD, such as hr.monash, it.monash, at.monash and my.monash.*

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

*An important pillar to our online strategy is to replicate my.monash.edu to the shorter version of my.monash. As described earlier we have, through an intermediary, reached out to Malaysian government and ccTLD manager. We do not believe that the Malaysian Government or the ccTLD operator has any justifiable jurisdiction over the use of the "my" two character label at the second level of the .monash TLD, particularly as we intend to use the two character label to mean the word "my" rather than an association with the country of Malaysia.*



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## Timeline

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

*Immediate*

## Business Description

Describe how the Proposed Service will be offered:

*Monash University intend to operate the .monash TLD in accordance with the requirements set forth in Specification 13. As such, all domains under the .monash TLD will be registered to and controlled by Monash University, its Affiliates, or its Trademark Licensees. Monash University does not intend to sell .monash domain names to the general public or to allow unaffiliated third parties to control the DNS records associated with domains in the .monash TLD. The purpose of the .monash TLD is to establish a cohesive, clear, dedicated and immediately identifiable online identify for Monash University and enhance our existing global footprint. \nMonash University currently provides an informational portal for students, academics, professional staff, researchers, business partners, alumni and other Internet users through a large and diverse domain name portfolio. The .monash TLD will allow the Monash University to rationalize its digital communication in a single TLD that will function as a dedicated, authoritative and easily located online space for Monash University; however, absent the use of two character labels we believe the ability to achieve the aspirations for the TLD will be severely limited. The ability to use any combination of two character labels without exclusion allows considerably more flexibility to achieving our mission. \nGiven our existing global footprint the use of two-letter country codes will allow us to delineate products using existing country codes; however there will also be instances where we intend to use two letter country codes which are also words or have other meaning, such as my.monash, it.monash, hr.monash and at.monash. \n*

Describe quality assurance plan or testing of Proposed Service:

*Not Applicable*

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

*Not Applicable*



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## Contractual Provisions

List the relevant contractual provisions impacted by the Proposed Service:

*Specification 5, Section 2 of the Registry Agreement provides: "Two-character labels. All two-character ASCII labels shall be withheld from registration or allocated to Registry Operator at the second level within the TLD. Such labels may not be activated in the DNS, and may not be released for registration to any person or entity other than Registry Operator, provided that such two-character label strings may be released to the extent that Registry Operator reaches agreement with the related government and country-code manager of the string as specified in the ISO 3166-1 alpha-2 standard. The Registry Operator may also propose the release of these reservations based on its implementation of measures to avoid confusion with the corresponding country codes, subject to approval by ICANN. Upon conclusion of Registry Operator's designation as operator of the registry for the TLD, all such labels that remain withheld from registration or allocated to Registry Operator shall be transferred as specified by ICANN. Registry Operator may self-allocate and renew such names without use of an ICANN accredited registrar, which will not be considered Transactions for purposes of Section 6.1 of the Agreement."*

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

*None.*

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

*None.*

## Contract Amendments

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

*This request is pursuant to Specification 5, Section 2 of the Registry Agreement. According to Specification 5, Section 2 the request may be implemented provided approval by ICANN. In the vein of ICANN's proposed amendments to address other requests to release two-character labels, Exhibit A of the .monash Registry Agreement would be amended to read: "Notwithstanding Section 2 of Specification 5 of the Agreement, Registry Operator may offer registrations for and activate in the DNS all combinations of two-character ASCII labels, including those provided on the ISO 3166-1 alpha 2 standard."*

## Benefits of Service



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Describe the benefits of the Proposed Service:

*End users will benefit from the ability to navigate to two-character ASCII labels at the second level of the .monash TLD that match the abbreviations used by the university in its operations and are part of the university lexicon, such as my.monash, hr.monash (for the human resources department), it.monash (for the IT department) and at.monash (to describe the on-campus experience). These labels are short and memorable and will improve our end-users experience.*

## Competition

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

*No direct impacts to competition are anticipated; however, the addition of two-character labels is an important element of the long term strategy for the success of the .monash TLD. An easy to navigate and highly visible TLD can only enhance the reputation of Monash University in the education sector and we would hope, more broadly, to become a showcase for the benefits of TLDs.*

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

*Monash University is an education facility with global reach which will be enhanced by the addition of the .monash TLD.*

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

*All pre-2010 registries are already permitted to use two character labels, regardless of whether they appear on the ISO 3166-1 alpha-2 list. Some two-character code deployment will use the codes from the ISO 639-1 alpha 2 list (languages). All registries are permitted to use two character labels within the directory of the domain name label of the form: brand/au (for Australia). Additionally, ICANN has received similar RSEP Requests for the release of some or all two character labels. In its initial review, ICANN determined that the introduction of two character labels to the marketplace did not pose significant competition or security and stability concerns for other new gTLDs that have requested to release two character labels.\n\nIn addition, many ccTLD registry operators allow two letter country codes at the second level, for example .co.uk or .co.nz; however, the use of .co in both examples is not used to denote the country of Columbia but rather as an accepted shortening of the word commerce or commercial entity. Some years ago .co ccTLD took advantage of the similarity of their country code to the well-known .com TLD and campaigned as the alternative.\n\n*





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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?:

*No. These domains will be used to facilitate user navigation by providing short, meaningful, and memorable domain names upon which Internet users can access Monash University content. These domain names will not be sold to third parties.*

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.:

*Yes, ARI Registry Services is our technical back-end registry provider and would be responsible for implementing the introduction of two character labels.*

Have you communicated with any of the entities whose products or services might be affected by the introduction of your proposed Registry Service? If so, please describe the communications.:

*As discussed previously in this request, we have reached out to the Malaysian government and ccTLD manager, but not because we believe their products or services might be affected by the introduction of our proposed Registry Service. Monash University has successfully managed my.monash.edu for many years without any adverse impact on the operation of the .my ccTLD. Similarly, we do not believe the operation of "my.monash" would have any adverse impact on the operation of that ccTLD.*

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).:

*In many past RSEP requests posted on the ICANN website, ICANN determined in its initial review that the introduction of two-character labels did not pose any significant competition concerns.*

## Security and Stability

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

*The proposed service will not alter storage and input of Registry Data.*

Please explain how the proposed service will affect the throughput, response time, consistency or coherence of



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reponses to Internet servers or end systems:

*The proposed service will have no effect.*

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

*No technical concerns have been raised. The RSTEP evaluated this service for the .name TLD operator and found there to be no technical issues. During a ccNSO meeting recently in London, Lyman Chapin, Chair of the RSTEP, informed the meeting that the RSEP applications requesting the use of two-character labels had not been referred to the RSTEP by ICANN staff "... primarily because none of us, either staff or myself, going back to the 2006 review, have found any reason why the conclusions of that review should not apply to the current case." <http://london50.icann.org/en/schedule/tue-ccnso-members/transcript-ccnso-members-24jun14-en.pdf>.*

## Other Issues

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

*The proposal does not increase any risk of intellectual property infringement. It is our understanding that the GAC has written to ICANN indicating that they will be discussing the release of two character labels at the ICANN meeting in Los Angeles in October 2014. We would make the point here, for lack of opportunity to do so elsewhere, that the use of two letter country codes at the second level of a TLD is not a sovereignty issue. The use of the ISO 3166-1 list as the basis to assign and delegate ccTLDs does not mean that there are no other valid uses of the two character labels contained in the ISO 3166-1 list. Country code managers, or governments, do not own the rights to the letters which constitute the ccTLD. Despite this ICANN has built in some protections for country code managers in the New gTLD Registry Agreement. These protections do not assume ownership of these country codes by their respective governments or ccTLD managers. They rightfully do not contain a blanket prohibition against the use of these names and render the relevant government and country code manager the sole arbiter for any requests for an exemption to this prohibition. What they allow is for these country codes to be released where the new gTLD Registry Operator implements measures to avoid confusion with the corresponding ccTLD. ICANN decides this and ICANN staff have advised registry operators that the process to do this is RSEP. This protection in the absence of any formal ownership of rights by governments or ccTLD managers is recognition by ICANN of the interest in, but not rights held by those governments and ccTLD managers, in two character labels.*

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:

*No.*

Any other relevant information to include with this request:

*None.*