Subject: Business Constituency (BC) comment on release of geo-names in .IKANO, .SAXO, .SCOR, .SANDVIK, .WALTER, .SANDVIKCOROMANT, .VISTA, .VISTAPRINT, .BARCLAYS, .BARCLAYCARD and .HERMES TLDs

Date: Friday, February 24, 2017 at 10:18:33 AM Eastern Standard Time

From: Steve DelBianco

To: comments-ctn-release-tlds-12jan17@icann.org

The Business Constituency ("BC") appreciates the opportunity to provide comments regarding the proposed amendments to the .IKANO, .SAXO, .SCOR, .SANDVIK, .WALTER, .SANDVIKCOROMANT, .VISTA, .VISTAPRINT, .BARCLAYS, .BARCLAYCARD and .HERMES registry agreements submitted through the Registry Services Evaluation Policy ("RSEP") on 28-July-2016 (for .IKANO), and 12-Oct.-2016 (for the remainder of the TLDs), respectively, and posted for public comment on 12-Jan.-2017 at https://www.icann.org/public-comments/ctn-release-tlds-2017-01-12-en

The .IKANO, .SAXO, .SCOR, .SANDVIK, .WALTER, .SANDVIKCOROMANT, .VISTA, .VISTAPRINT, .BARCLAYS, .BARCLAYCARD and .HERMES Requests

In their respective RSEP requests, Registry Operators Ikano S.A., Saxo Bank A/S, SCOR SE, Sandvik AB, Vistaprint Limited, Barclays Bank PLC, and Hermes International seek the release of all country and territory names, as defined in Section 4 of Specification 5 of the Registry Agreement, at all levels of the .IKANO, .SAXO, .SCOR, .SANDVIK, .WALTER, .SANDVIKCOROMANT, .VISTA, .VISTAPRINT, .BARCLAYS, .BARCLAYCARD and .HERMES TLDs. The BC fully supports these requests submitted by .BRAND registries. (see list of prior Business Constituency comments below).

As set forth in our previous comments supporting similar RSEP requests, the BC believes that the use of country and territory names will allow .BRAND registries to create customized and relevant localized content for consumers in various countries and regions across the world, especially in developing nations with predominantly non-English-speaking populations. This geographic segmentation will not only bring greater efficacy to .BRAND TLDs, but it will benefit businesses and consumers alike by fueling economic development in regions which currently have limited choice with respect to linguistically and culturally tailored domain names and content.

In addition, we firmly believe that the release of country and territory names for .BRAND TLDs will enhance security and trust in online commerce by permitting businesses to exercise more control over the security and stability of their customized web sites.

Finally, the BC considers that use of country and territory names within a .BRAND registry will always avoid confusion with an official government web property. Indeed, the very basis of the .BRAND TLD model is for the brand to serve a unique source identifying function at the top-level, and for geographic names to serve a purely descriptive function at the second level. Thus, especially given the context of the underlying commercial sites, consumers directed to country.brand domain names will always be aware that they are engaging with a geographically-targeted version of a company's official web site as opposed to a government property. The BC also notes the historical availability of country and territory names at all levels in all legacy TLDs. .BRAND TLDs should be afforded the same opportunity to allocate such names, given that the risk of abuse or confusion by the use of such names in a .BRAND registry is low.

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This comment was drafted by Andy Abrams and approved in accord with the BC Charter.

The BC has consistently supported the release of country and territory names at all levels in .BRAND TLDs, including the comments listed below:

[Comment on Neustar's Proposal for Country and Territory Names](#) (Nov. 8, 2014);

[Comment on the Release of Country and Territory Names in the .BMW and .MINI TLDs](#) (Jan. 24, 2015);

[Comment on Release of Country and Territory Names for the .EMERCK, .BERLIN, and .HAMBURG TLDs](#) (April 1, 2015);

[Comment on Release of Country and Territory Names for the .HONDA, .AXA, .EPSON, .HSBC, .XYZ and .COLLEGE TLDs](#) (April 28, 2015);

[Comment on Release of Country and Territory Names for the .SONY, .ARCHI, .BIO and .SAARLAND TLDs](#) (June 14, 2015);

[Comment on Release of Country and Territory Names for the .KOMATSU and .RICOH TLDs](#) (June 14, 2015);

[Comment on Release of Country and Territory Names for the .GLOBAL, .BNPPARIBAS, .BRIDGESTONE and .FIRESTONE TLDs](#) (August 2, 2015);

[Comment on Release of Country and Territory Names for the .BROTHER .GEA .ACO .SECURITY .PROTECTION .THEATRE and .RENT TLDs](#) (Oct. 22, 2015);

[Comment on Release of Country and Territory Names for the .STUDY, .COURSES, .LAMBORGHINI, XN--3OQ18VL8PN36A, .VOLKSWAGEN, .BUGATTI, .AUDI and .DELTA TLDs](#) (Jan. 27, 2016);

[Comment on Release of Country and Territory Names for the .TORAY and .PICTET TLDs](#) (May 10, 2016);

[Comment on Release of Country and Territory Names for the .HYUNDAI, .KIA, and .GODADDY TLDs](#) (June 9, 2016).

[Comment on Release of Country and Territory Names for the .SOFTBANK, .CARAVAN, and .ART TLDs](#) (Sept. 6, 2016)