

**ISPCP Comments on
The Protection of Geographic Names in the New gTLDs Process**

The Internet Services Provider and Connectivity Provider Constituency (ISPCP) respectfully submits the following comments on the “The Protection of Geographic Names in the New gTLDs Process”.

Our major concerns with respect to the process suggested are

- Unclear and overly broad definition of what constitutes a geographic name
- Unclear definition of “public interest”

1. Geographic name

It is extremely unclear in this proposal what is intended to constitute a geographic name, The proposal refers to “country, territory or regional language or people descriptions.” This can be broadly interpreted to cover most anything. Without far more clarity, this proposal risks appearing to provide the GAC with broad sweeping authority over the gTLD process while adding tremendous uncertainty into the existing system.

2. Public interest

The proposal does an insufficient job of explaining public interest. It describes needing to seek approval or non-objection from “the relevant authorities” when a geographic name is applied for. However it does not define what authorities is considered relevant, nor does it define what constitutes an approval process. More troublingly, the proposal does not specify who determines what the public interest is in the case of a disagreement.

The ISPCP constituency will continue to comment in the subsequent dialogue phases.

On behalf of the ISPCP constituency:

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