Annex 1

The protection of geographic names in the new gTLDs process

V3 – August 29 2014

Prepared by Sub-working group for protection of geographic names in next rounds of new gTLDs

1. Mandate

During the 47 ICANN meeting in Durban the GAC recommended that ICANN collaborate with the GAC in refining, for future rounds, the Applicant Guidebook with regard to the protection of terms with national, cultural, geographic and religious significance, in accordance with the 2007 GAC Principles on New gTLDs, as stated in section 7. a. GAC Durban Communiqué.

This document describes suggested steps in order to refine, for future rounds, procedures to be followed by applicants and changes to the Applicant Guide Book with regard to the protection of geographic names.

2. Background

The GAC of ICANN worked several months during 2006 and 2007 in the document called "GAC principles regarding new gTLDs" that was finalized by the GAC during the Lisbon ICANN meeting in 2007.

Full document can be found in this link:

http://archive.icann.org/en/topics/new-gtlds/gac-principles-regarding-new-gtlds-28mar07-en.pdf

Special attention was given to names with national, cultural, geographic and religious significance, as stated in the mentioned document:

- New gTLDs should respect national sensitivities regarding terms with national, cultural, geographic and religious significance
- New gTLDs should not prejudice the application of the principle of national sovereignty
- Internet naming system is a public resource and it must be administered in the public and common interest

Also other important reference in paragraph 2.2 of the same document:

- ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with the relevant governments or public authorities

These concerns were captured in the Applicant Guidebook ("AGB")

The AGB is a document that was always available for public comments and created in a bottom up process by the GNSO council and then reviewed by the whole community, including private companies and commercial brand owners.

Full text of the AGB can be found in this link:

http://newgtlds.icann.org/en/applicants/agb

In the case of geographic names, the Applicant Guidebook establishes what a geographic name is:

- Capital city names
- City names where applicants declare that they intend to use the gTLD for purposes associated with the city name
- Sub-national place names listed in the ISO 3166-2
- Regional names appearing on the list of UNESCO regions
- Regional names on the UN's "Composition of macro geographical (continental) regions, geographical sub-regions, selected economic and other groupings

Although these definitions of what is a geo name include approx. 5.000 names, it does not cover all the possible geo names in the world.

For this precise reason and in the event of any doubt or concern, the AGB establishes that:

> "It is in the applicant's interest to consult with relevant governments and public authorities and enlist their support or non-objection prior to submission of the application, in order to preclude possible objections and pre-address any ambiguities concerning the string and applicable requirements"

These consultations did not happen with some geographic names requested by applicants in the first round of newgTLDs.

The AGB establishes ways in which governments can express concerns related with community, geographic, religious or other scripts. These processes are all explained in the AGB:

- Early warning: message sent to the applicant expressing concerns of one or more governments.

- GAC Advice: message sent from the GAC to the Board expressing concerns from the GAC related with one string.
- Objection: Independent Objector - Governments – Private – ALAC

Finally, the recently Approved Resolution of the New gTLD Program Committee[1] about GAC adive on ".amazon" and the analysis made by the independent third-party expert, bring new considerations about new gTLDs, trademarks and geographic names, which are detailed in section 4 of this document.

3. The protection of Geographic Names

The protection of geographic names should be object of special concern within the new gTLD program[2] . ICANN as an institution is committed to acting on public interest[3] , and therefore new gTLDs that are related with words, strings and expressions that refer to different names of geographic references like regions of countries, regions of continents, sub-regions of countries, rivers, mountains, among others, should be protected in the name of public interest, due to their geographic, cultural and national relevance.

Although there are references that prevent the use of geographic names in new gTLDs included in the Applicant Guidebook, this list is limited and not sufficient to avoid the misuse of other geographic names and to protect the public interest in its entirety. It includes a limited amount of names and it does not protect in any way the diversity of places and geographic names that can be found all around the world.

Special attention should be given to the issue of geographic gTLDs as a concept (in generic terms), as they intersect with core areas of interests of any state.

Contrary to the principle of freedom of use of geographic names, allowing private companies to register geographic names as part of gTLDs strings creates a high risk for these names to be captured by companies that want to use them to reinforce their brand strategy or to profit from the meaning of these names, limiting the possibility of utilizing them in the public interest of the affected communities. Besides, the request for identity between the geographic name and the one utilized in the string, allows room for confusion in the public and consumers, as it is unavoidable that a geographic name will evoke the related geographical site and its population.

Geographic names should not be allowed to be registered as gTLDs, unless requested by the relevant communities where they belong or after a specific authorization given by the government or community to the applicant.

The national community and geographic meaning of the requested strings as new gTLDs must prevail above any other interest.

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[1] See https://www.icann.org/resources/board-material/resolutions-new-gtld-2014-05-14-en

[2] See GAC Principles Regarding New gTLDs, of 28 March 2007.

[3] See ICANN ByLaws, Section 2, "Core Values", and ICANN AoC with the Departament of Commerce, of 30 Sep 2009.

4. Differences between trademarks and new gTLDs

There are differences between the concept and scope of a Trademark and a TLD.

Trademark rights are conferred by States to individuals for the sole purpose of protecting the bona fide use of a mark in a specific category of products or services. There is no system of brands in the world to grant general rights on the use of a sign or name. The applicant of a trademark registrant shall inform the agency of each country, which is the current use that does or intends to do with that mark. The State grants the exclusive right to such use and no more than that.

Requested trademark applications have been ordered for specific products and services which demonstrates its own recognition of the limitation of the company's rights. In the national nomenclature of goods and services, in accordance with the Treaty of Nice, there are 45 classes of goods and services.

The document prepared by Dr Jerome Pasa, as a third-party expert[4] to provide additional advice on the specific issues of application of law at the case of ".amazon", includes several paragraphs that are of high interest to the subject of this document, which are detailed as follows:

Paragraph 15.1:

.....

"an intellectual property right, whatever its nature, affords its owner an exclusivity or monopoly of exploitation over the subject matter of the right within the limits stipulated by law – whether national or regional – applicable to this right. This exclusive right allows its holder to prevent third parties from carrying out on this subject matter the acts of exploitation which the law reserves to him.

An intellectual property right is therefore, like any property, a right to exclude third parties and, in this case, a right to exclude unauthorised third parties from the scope of protection which the law grants to the owner of the intellectual property right.

Binding as against third parties, an intellectual property right never affords its owner the right to exploit or to use the subject matter of its right."

.....

"an intellectual property right does not grant its owner a right to use the intangible subject matter in question. The right grants him ownership, ownership which is always binding on unauthorised third parties, but not, unless misinterpreting the notion of intellectual

[4] See https://www.icann.org/en/system/files/correspondence/crocker-to-dryden-07apr14-en.pdf

property, the possibility to exploit the subject matter of its ownership in any circumstances.

15-2. The same applies under trade mark law.

A trade mark right – the right associated with the registration of a trade mark – grants the owner a monopoly binding on third parties within the limits defined by law.

However, the holder cannot invoke this right as a right to use the sign, even for the products and services specified in the registration, or even as the right to use the sign in particular forms, such as a new gTLD.

.....

The document states that exclusive right held by a company in its trade mark "does not therefore necessarily give it the right per se either to use it in any other form it may choose, such as a new TLD".

The document also express that a trade mark held by an applicant do not in legal terms give it a right to the new TLD of the trade mark.

5. Avoiding misuse of geographic names in future gTLD rounds

The lists of prohibited strings detailed in the Applicant Guidebook should be considered as a general reference for the applicant and not as a strict and only criteria to determine whether a name is geographic or not.

Governments should keep the right to oppose the delegation of a top level domain (even if it is not included on that list) on the basis of its sensitivity to national interests. Furthermore, that right should be enhanced for future rounds.

The flexibility and openness of criteria that applicants should have in relation with geographic names, especially in contacting previously to the application the relevant communities, does not undermine the multistakeholder structure and processes of ICANN and will not erode the confidence of global businesses.

On the contrary, a previous early contact with relevant communities and the applicant will generate confidence in the whole process and could also generate new ways of agreements among parties, before the conflict is established.

As stated in section 4 of this document and, an enhanced procedure to protect geographic names should not upset global trademark norms.

ICANN and Governments should encourage the applicants to get touch with related local governments to try to reach agreements. Dialogue and communication based on the laws and regulations is a better way to solve any difficulties. Furthermore, if the agreement between the relevant governments and the applicants can not be reached, the public interest should be priority.

6. Next steps

a. At the National / Regional Level

All countries should be encouraged to enhancing the ISO 3166-2 list by submitting official requests from national administrations, in a way that regions and sub-regions are included in this important reference list.

Special efforts must be done by ICANN to the broader international community, which is not comprised by GAC today.

GAC representatives and ICANN regional managers can actively engage in outreach efforts focusing in those countries not active in GAC meeting, GAC lists and ICANN activities, in order for them to be aware of future impact of this process.

The ISO 3166-2 list includes different types of country subdivisions names: districts, cantons, provinces, states, regions, cities, territories, among several others. The national reference in the ISCO 3166-2 list can be enhanced with these different divisions and subdivisions in order to satisfy the country needs.

b. Best practices for future rounds of new gTLDs

To be developed (by GAC + cross constituency group?) for future rounds of new gTLDs:

- For the applicant:
    - Once a sting is selected to be requested as a new gTLD, a thorough search should be undertaken to determine whether the string is a geographic name, including but not limited to cities, countries, regions, subregions or other geographic related spaces.
    - Sources of information on geographic names could be the general available information on the Internet, embassies, regional organizations, international organizations, national, regional and city governments, among others.
    - If the selected string is directly related with a country, city, region, subregion or other geographic related spaces, the relevant authorities related with these denominations should be contacted.
    - Related information can be accessed using Internet searches.

- Previous research and investigation about different meanings of the applied for string, considering also the notion of protection of a name even if it is being translated to another language.
- In the case of doubts, encourage the applicant to establish contact previous to the application with the relevant authorities of the country – city – region – subregion.

- For ICANN:
  - Enhance outreach efforts to all countries and regions of the world previous to the next new gTLD round.
  - Governments should have an appropriate way to raise concerns about the use of geographic names associated with their territories
- For Governments / Applicants / ICANN:
  - Establish a clear process for governments to raise their concerns when their territories names used in the next new gTLD round.
  - Establish clear steps / way forward for both the applicants and government in reaching consensus with the applied gTLD
  - What's next if there is no consensus reached between both parties.

c. Suggested changes in the Applicant Guide Book

Taking into consideration that the Durban Communiqué states that "The GAC recommends that ICANN collaborate with the GAC in refining, for future rounds, the Applicant Guidebook with regard to the protection of terms with national, cultural, geographic and religious significance, in accordance with the 2007 GAC Principles on New gTLDs", a new text is suggested regarding the geographic names, in the case that the same text of the present AGB will be used as ground document:

To include in the paragraph 2.2.1.4 of the AGB the following sentence:

> **"ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with the relevant governments or public authorities".**

Also the following paragraph appears in the section "***2.2.1.4.2 Geographic Names Requiring Government Support***" of the AGB. It should be a general statement or principle regarding geographic names, in order to clarify and reinforce the importance of the previous communication between the Applicants and the Governments, even in case of any doubt.

> **"Nevertheless, in the event of any doubt, it is in the applicant's interest to consult with relevant governments and public authorities and enlist**

their support or non-objection prior to submission of the application, in order to preclude possible objections and pre-address any ambiguities concerning the string and applicable requirements."

A specific reference to the Geographic Names Repository described in section 6.b of this document must be also included.

The suggested changes in the Applicant Guide Book, paragraph 2.2.1.4 of the AGB should read as follows:

"2.2.1.4 Geographic Names Review

Applications for gTLD strings must ensure that appropriate consideration is given to the interests of governments or public authorities in geographic names, ***taking into consideration that, according with the 2007 GAC Principles regarding New gTLDs, ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with the relevant governments or public authorities***. The requirements and procedure ICANN will follow in the evaluation process are described in the following paragraphs. Applicants should review these requirements even if they do not believe their intended gTLD string is a geographic name. All applied-for gTLD strings will be reviewed according to the requirements in this section, regardless of whether the application indicates it is for a geographic name.

"Nevertheless, in the event of any doubt, it is in the applicant's interest to consult with relevant governments and public authorities and enlist their support or non-objection prior to submission of the application, in order to preclude possible objections and pre-address any ambiguities concerning the string and applicable requirements."

Annex 2

THE INTERNATIONAL CENTRE FOR EXPERTISE OF THE

INTERNATIONAL CHAMBER OF COMMERCE

CASE No. EXP/423/ICANN/40

GULF COOPORATION COUNCIL

(SAUDI ARABIA)

vs/

ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE TIC. TLD. STI.

(TURKEY)

This document is a copy of original of the of the Expert Determination rendered in conformity with the New gTLD Dispute Resolution Procedure as provided in Module 3 of the gTLD Applicant Guidebook from ICANN and the ICC Rules for Expertise.

CASE No. EXP/423/ICANN/40

GULF COOPERATION COUNCIL (SAUDI ARABIA)

vs/

ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE TIC. TLD. STI. (TURKEY)

Expert Determination by

Judge Stephen M. Schwebel

ANNEX 2

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EXPERT DETERMINATION

1. An Application for the registration of a Generic Top- Level Domain Name ("gTLD"), namely, ".Persiangulf", was generated on 8 July 2012 by the Applicant, ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE. TIC. LTD. STI. (Turkey). Its address is Contact Information Redacted . The Applicant is represented by Mr. Mike Rodenbaugh, Rodenbaugh Law, Contact Information Redacted

2. A Community Objection was filed to the registration of ".Persiangulf" on 13 March 2013. The Objector is the GULF COOPERATION COUNCIL Its address is Gulf Contact Information Redacted . The Objector is represented by Mr. Badr El-Dein Abdel Khalek, Talal Abu Ghazaleh Organization, Contact Information Redacted

3. The Response of the Applicant to the Community Objection was filed on 15 May 2013. The language of all submissions and proceedings is English, in accordance with Article 5(a) of the Procedure.

4. All communications by the parties, the Expert Panel and the International Centre for Expertise of the International Chamber of Commerce ("Centre") were transmitted electronically in accordance with Article 6(a) of the Procedure.

5. The Expert Panel, Stephen M. Schwebel (Contact Information Redacted) was appointed on 12 June 2013 by the Chairman of the Standing Committee of the Centre. In making his determination, the Expert, the sole member of the Panel, acted in accordance with the Rules for Expertise of the ICC, supplemented by the ICC Practice Note on the Administration of Cases under the Attachment to Module 3 of the gTLD Applicant Guidebook, New gTLD Dispute Resolution Procedure (the "Procedure").

6. The file was transmitted by the Centre to the Expert Panel on 12 August 2013, which accordingly is the date of the Expert Panel's final constitution. On 21 August 2013, the Expert informed the Parties by e-mail of his receipt of the file, and that additional submissions were not requested and a hearing was not contemplated. The Parties did not file further submissions or request to do so and did not request a hearing. The Expert rendered the Panel's determination to the Centre for its scrutiny within the 45-day time limit of the transmission of the file.

Summary of the Objection

7. The Community Objection is made by the Cooperation Council for the Arab States of the Gulf, known as the Gulf Cooperation Council (GCC). The Objection recalls that the GCC is an intergovernmental organization, established by treaty duly registered with the Secretariat of the United Nations, composed of six Arab States bordering the Gulf, namely, Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates. Its mission is to effect coordination and integration among its Member States in all fields.

8. The GCC, the Objector in these proceedings, observes that the Applicant in these proceedings has applied for the gTLD ".Persiangulf", referring to the body of water which separates the Arabian Peninsula and the territory of Iran. The Objector recalls that, while surrounding Arab States maintain that that body of water should bear the name "Arabian Gulf", Iran "stands for the denomination 'Persian Gulf'". The GCC, as an established institution of the Arabian Gulf community which objects to the applied-for gTLD, maintains that, "ICANN should not authorize the launch of this gTLD and therefore interfere in a sensitive case."

9. The Objector acknowledges that, for a Community Objection to be upheld, there must be "a substantial opposition to the gTLD application from a representative portion of the community to which the gTLD string may be explicitly or implicitly targeted". The Objector notes that the Application for ".Persiangulf" has given rise to numerous negative comments on ICANN's webpage. The Governments of Bahrain, Oman, Qatar and the United Arab Emirates issued an "early warning" expressing serious concern, observing that the gTLD is "problematic and refers to a geographical place with a disputed name" and maintaining that there is a lack of community involvement and support among the eight littoral States for a consensual name, whether "Arabian Gulf" or "Persian Gulf". The Objector recalls that there is a longstanding dispute over the

question among these littoral States, namely, Bahrain, Iran, Iraq, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates. "They cannot reach a consensus on a unique name for the designated body of water and use alternatively the name of 'Arabian Gulf' or 'Persian Gulf'". The Objector contends that ICANN should not "bring this dispute into the cyber world and by doing so give credence to one side over the other". The Objection reproduces a map of the 16th Century that denominates the Gulf as the "Arabian Gulf" as well as a contemporary map of Google that leaves that body of water unnamed in deference to objections that have been raised against one name or another. The Objector notes that the Gulf has borne various names over the centuries.

10. The Objector observes that the notion of "community" is broad and not precisely defined by ICANN's Guidebook for the new gTLD program. The Objector views the Arab States of the Gulf as a clearly delineated community. "A substantial portion of the Arabian Peninsula Community is opposing the string '.Persiangulf. '" The opposition of the GCC States demonstrates "that there is an obvious and substantial opposition from a significant portion of the community".

11. The Objector notes that the Application states that, "A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce....The PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf." The Objector continues: "This clearly shows that the applicant is targeting a confined community which consist of people and organizations bordering the gulf basically covering the 8 countries namely Bahrain, Iran, Iraq, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates. Thus, if the applied for gTLD string does not intend to explicitly target opponents to the 'Persian Gulf' denomination, at least an implicit link can be easily identified. Hence, a strong association between the applied - for gTLD string '.Persiangulf' and the community represented by the Objector (i.e. GCC) exists."

12. The Objector further contends that the existence of such a sensitive gTLD without the endorsement of the Arabian Gulf community will allow the Applicant to interfere with the core activities of the community, and that there is a likelihood of material detriment to the targeted community resulting from the Applicant's operation of ".Persiangulf". Use of that term online "is likely to increase the possibility of social unrest in the Arabian gulf region" and hence the level of dispute around the naming of this area.

13. The Objector concludes that, since there is no consensus on the name of the gulf, and because "the majority of the targeted community recognizes the name "Arabian Gulf" as opposed to "Persian Gulf", the limited interest of the targeted community in the proposed name will affect its sustainability".

14. The remedy requested is the withdrawal of the Application.

Summary of the Response

Standing

15. The Applicant initially contends that the Objector, the GCC, lacks standing to object. It observes that Section 3.2.2. of the Applicant Guidebook provides the following requirement for standing to assert a Community Objection: "Established institutions associated with clearly delineated communities are eligible to file a community objection. The community named by the objector must be a community strongly associated with the applied-for gTLD string in the application that is the subject of the objection." The Applicant maintains that the GCC however "fails to provide any evidence that the name of the body of water is a 'sensitive case' or has anything to do with the GCC's mission." The GCC "has no strong association to the TLD string .PersianGulf, and therefore lacks standing in the matter."

16. The Applicant observes that many of the Arab States of the GCC consider the body of water at issue to be called the Arabian Gulf. "And so those states and/or the GCC itself are free to apply to operate the TLD .ArabianGulf if they so choose. But they offer not the faintest shred of proof to show the required 'strong connection' between the GCC and the TLD string .PersianGulf". They rather disavow that name in favor of another. Therefore, the Applicant maintains, the GCC as the Objector clearly lacks standing to assert a Community Objection to the .Persian Gulf TLD Application.

Applicant's Community Support

17. The Applicant further contends that it has "garnered overwhelming community support"—"more than 48,000 individual expressions of support via an online petition.... for .PARS and .PersianGulf submitted to ICANN...." in addition to the support of the Islamic Republic of Iran.

The GCC Lacks Proper Grounds for Objection

18. The Applicant moreover maintains that the Objector fails to meet the four tests prescribed by the Applicant Guidebook, Section. 3.5.4 of Module 3.

19. First, it must show that the community invoked by the Objector is a clearly delineated community. But, the Applicant contends, the Objector provides no evidence of the existence of the purported "Arabian Peninsula Community." It appears to be "an imagined ad hoc community devised solely in response to Applicant's application." Its existence is hardly sustained by a Google search. Nor are geographical boundaries on one side of the Gulf supportive of the existence of a clearly delineated community. Even if it were accepted that the GCC represents its six member States as the Arabian Peninsula Community, and that their populations support the GCC position that .PersianGulf should not exist as a TLD string, their populations would total 39.4 million.

On the other side of the Gulf lies Iran, with more than 75 million people. The Applicant maintains that the Government of the Islamic Republic of Iran supports the .PersianGulfApplication. It observes that Iranians ubiquitously refer to the Persian Gulf. It recalls that United Nations documents mandate reference to the Persian Gulf. It notes that there are hundreds (if not thousands or millions) of maps that refer to the Persian Gulf, as do almost all maps printed before 1960. Calling the body of water between the Arabian Peninsula and Persia as the "Persian Gulf" has been predominant and pervasive for some 2500 years. "The 'Arabian Peninsula Community' did not exist prior to this Objection, and shows no association with the .PersianGulf TLD string."

20. "Therefore, it is not clearly delineated within the meaning of the Guidebook, and the Objection must fail."

21. Second, the Applicant argues, there is no substantial, proven community opposition to the Application. Reference to "numerous comments", and to "early warnings" from four GCC Member States, do not suffice. The purported "Arabian Peninsula Community" represented by the GCC disavows the Persian Gulf name and has no association with that name. So its opposition cannot be considered substantial.

22. Third, in respect of "targeting", the Applicant contends that the Objector must prove a strong association between the applied-for TLD string and the community represented by the Objector. The Objector cites the fact that the Applicant intends to promote the .PersianGulf domain names to persons in the Persian Gulf region. But the Applicant responds that it would not plan to sell the .PersianGulf domain names to persons in the region "who disavow the very name". Such persons, apparently represented by the GCC, "are not likely to be interested in .PersianGulf domain names whatsoever, nor to be harmed by their existence. Therefore they cannot claim any association with that TLD string."

23. The Objector accepts that the Applicant does not intend explicitly to target opponents of the Persian Gulf denomination. But it claims that "an implicit link can easily be identified." It fails however to identify that link or provide evidence of its significance. "Any such link would be a link of non-association, or disavowment of the denomination 'Persian Gulf' – and thus is the polar opposite of the 'strong association' " that the Objector is required to prove.

24. Fourth, in respect of detriment, the Applicant maintains that theObjector must prove that acceptance of the Application creates a likelihood of material detriment to the rights or legitimate interests of a significant portion of the community to which the string may be explicitly or implicitly targeted. But, argues the Applicant, the Objector hardly addresses, still less evidences, the several detrimental factors set out in the Guidebook. It says no more than that allowing "the existence of such a sensitive string without the endorsement of the Arabian Gulf community which is linked to this area will allow the applicant to interfere with the core activities of the community that would result from the applicant's operation of the applied-for gTLD string. Hence, there is likelihood of

material detriment." The Applicant states that ICANN's Independent Objector, Dr. Alain Pellet, thoroughly reviewed the purported public opposition to the .PersianGulf TLD, and found no basis for any "Public Interest" or "Community Objection". The Applicant in its Application affirmed its public interest commitment in detail and has entered into organizational arrangements that will give effect to that commitment. It contends that, "Such documented efforts must outweigh GCC's rank speculation that the TLD will somehow in some unspecified manner affect regional residents' 'core activities'. All regional ccTLDs are still available for their use. Perhaps soon the GCC or another entity will apply for the .ArabianGulf TLD and it can be provided to residents as well." The Objector argues that the existence of political disputes over the name of the Gulf somehow proves that "concrete damages" are likely to occur to the Objector's community, but offers no proof to sustain this speculation. The Objector has offered no evidence of a dispute over the name. People have called the Gulf by different names "for many centuries if not millennia". But there is no evidence "as to how such purported dispute has ever caused or contributed to any social unrest in the region or elsewhere." The Objector "has wholly failed to prove any likelihood of any detriment to anyone, and thus its Objection must fail."

25. Attached to the Response of the Applicant are extensive annexes, including an archive of maps denominating the Gulf as the "Persian Gulf".

The Determination of the Expert

26. The first question to be decided is, does the Objector have standing, pursuant to Article 8(a)(ii) of the Procedure, and to Module 3 of the Guidebook, Articles 3.2.2 and 3.2.2.4, to object?

27. The Applicant maintains that the Objector characterizes itself as the "Arabian Peninsula Community". That Community, says the Applicant, is an imaginary construct which lacks standing to object to the Application because it is not part of the Persian Gulf community. According to the Applicant, it is, on the contrary, the polar opposite because it disavows the very name of that community, a community which is directed only to those of Iranian heritage and interests.

28. This position of the Applicant however is not wholly consistent with the terms of its Application. The Application's description of the mission and purpose of ".PersianGulf" emphasizes the ethnicity of more than one hundred million Persians worldwide and their common cultural, linguistic and historical heritage. However, it also states that: "While the .PERSIANGULF TLD ties back historically and culturally to the Middle Eastern people, it also has the potential to tie together the great number of people across the globe that may have any ties to or business in the region....A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce....The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources.

The total population of the countries in the Persian Gulf region exceeds 120 million people – and all of them have a sense of belonging to the Persian Gulf. The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf."

29. In the view of the Expert, it is incontestable that among the "peoples of various nations connected geographically and historically to the Persian Gulf" are the Arab inhabitants of the west side of the Gulf. It is undeniable that among "these peoples of various nations, connected geographically and historically to the Persian Gulf", who have "a sense of belonging to the Persian Gulf" and are to be "tied together" by .PERSIANGULF gTLD, are Arabs inhabitants of the region. Many of those Arabs are inhabitants of the six States of the western littoral of the Gulf that have joined together to constitute the Gulf Cooperation Council. Through and by the agency of the Gulf Cooperation Council, an established intergovernmental organization internationally representing those inhabitants, which is the Objector in these proceedings, they have standing to challenge the registration of .PERSIANGULF gTLD. The Gulf Cooperation Council is an established, defined institution, constituted by treaty registered with the United Nations ("UN"). Founded in 1981, its existence and operations pre-date by decades the instant challenge that it has made; the GCC has not been formed for the purpose of raising its challenge. Its observer status at the United Nations imports global recognition of the GCC. It enjoys international legal personality. It has permanent headquarters in Riyadh, Saudi Arabia, and a range of activities designed to promote the co-ordination and integration of its Member States and to strengthen relations among their peoples, including their communications, education and culture. The GCC's institutional purposes thus are to promote the co-operative benefit of the inhabitants of "the associated community", namely the population of the GCC States. The Gulf Cooperation Council accordingly meets the criteria for standing to maintain a challenge set out in the Guidebook, Module 3, Articles 3.2.2 and 3.2.2.4.

30. The second question to be decided is, is there substantial community opposition to the Application?

31. Accepting that the community in question, pursuant to the foregoing interpretation of the Application set out in paragraphs 28 and 29 above, includes the Arab inhabitants of the Gulf who make up the population of the six States of its western littoral that compose the Gulf Cooperation Council, it is plain that there is substantial opposition of these Arab inhabitants of the Persian Gulf community and of the GCC which represents them internationally to the registration of .PERSIAN GULF gTLD. That opposition is reflected in the Summary of the Objection, paragraphs 7 to 14 above. Moreover, there has been vocal, reiterated challenge by Arab States and sources to the Persian Gulf denomination for more than fifty years. That challenge has been reflected in United Nations documentation. For example, an Editorial Directive of 10 January 1990 (ST.CS.SER.A/29) states, in the customary muted diplomatic parlance of United Nations

Secretariat documents, that: "The term 'Persian Gulf' is used in documents, publications and statements emanating from the Secretariat as the standard geographical designation for the body of water lying between the Arabian Peninsula and the Islamic Republic of Iran, thus following longstanding conventional practice....However, in documents, publications and statements emanating from a Member Government or intergovernmental organization, the terminology of the original should be retained."

32. It is true that Arab Governments and sources, including the Objector in these proceedings, disavow the propriety of calling the Gulf the "Persian Gulf". But it does not follow that that disavowal imports that they are not part of the Persian Gulf community. The Persian Gulf is a geographical expression. It refers to a body of water separating the Arabian Peninsula from the landmass of Iran. The people who live round the littoral of that body of water may reasonably be viewed as a community, even though it is a community that is characterized by ethnic, historical, religious and political differences. Moreover, the opposition of Arab States and populations to denominating the Gulf as the Persian Gulf is substantial, as is manifested by the fact, of which the Expert takes judicial notice, that Arab States, individually and collectively, and Arab individuals and organizations, refer to the Gulf as the Arabian Gulf (as illustrated by the foregoing quotation from a UN document).

33. The third question to be decided is, is the target of the proposed domain explicitly or implicitly the Arab community of the Gulf?

34. The paramount objective of the proposed .PERSIANGULF gTLD is to provide an internet link among Iranians and persons of Iranian heritage, whether those persons live in or outside of Iran. However, as paragraphs 11, 28 and 29 above make clear, an objective of the domain is to tie together "peoples of various nations, connected geographically and historically to the Persian Gulf". It follows that .PERSIANGULF gTLD, if not explicitly targeted to affect the inhabitants of the GCC States, implicitly targets them.

35. While the foregoing is a plausible conclusion, it is not necessarily an exclusive one. The language just quoted is open to the interpretation that not only the principal but sole objective of .PERSIANGULF gTLD is to establish an internet link among Iranians and persons of Iranian heritage whether they are nationals of Iran or of various other nations.

36. If that is indeed the sole objective however, the question arises, why is not the domain named .PERSIANHERITAGE rather than .PERSIANGULF? If the objective is confined to persons of Persian origin, why choose a geographical name? Why choose the name of a body of water that indisputably is bound up with the heritage not only of persons of Persian derivation but of millions of Arabs as well?

37. In view of these considerations, it is concluded that Arab inhabitants of the region would be implicitly targeted were .PERSIANGULF gTLD to be registered.

38. The fourth question that must be decided is whether those who are found to be implicitly targeted suffer the likelihood of material detriment to their rights or legitimate interests.

In this regard, the Guidebook provides in respect of a Community Objection, at Article 3.5.4:

"Detriment The objector must prove that the application creates a likelihood of material detriment to the rights or legitimate interests of a significant portion of the community to which the string may be explicitly or implicitly targeted....Factors that could be used by a panel in making this determination include but are not limited to:

- *Nature and extent of damage to the reputation of the community represented by the objector that would result from the applicant's operation of the applied-for gTLD string;*
- *Evidence that the applicant is not acting or does not intend to act in accordance with the interests of the community or of users more widely...*
- *Interference with the core activities of the community that would result from the applicant's operation of the applied-for gTLD string;*
- *Dependence of the community represented by the objector on the DNS for its core activities;*
- *Nature and extent of concrete or economic damage to the community represented by the objector that would result from the applicant's operations of the applied-for gTLD string; and*
- *Level of certainty that alleged detrimental outcomes would occur.*

If opposition by a community is determined, but there is no likelihood of material damage to the targeted community resulting from the applicant's operation of the applied-for gTLD, the objection will fail."

39. The Objector maintains that "allowing the existence of such a sensitive string without the endorsement of the Arabian gulf community which is linked to this area will allow the applicant to interfere with the core activities of the community that would result from the applicant's operation of the applied-for gTLD string. Hence, there is likelihood of material detriment...."
40. In the view of the Expert, the foregoing argument does not provide or constitute proof that the Application if granted will create a likelihood of material detriment to the community of the Objector. Nor is it easy to see what material detriment is likely to occur, which may explain why the Objection is so terse in this regard. In the perception of the Expert, the fact remains that the practical effect of registration of .PERSIANGULF gTLD is difficult to discern and weigh. Hence it follows that a likelihood of material detriment has not been established.
41. This is not to suggest that the dispute is not important to the States and interests concerned. Such denomination disputes can be of high importance, roiling international

relations. One such dispute recently was the subject of a contentious case in the International Court of Justice. Other current such disputes concern, among other issues, the conflicting denomination of islands or of a sea between two countries.

42. The dispute between Arab States and supporters, on the one hand, and the Islamic Republic of Iran and its supporters, on other hand, over the denomination of the Gulf, has subsisted for more than fifty years. It is far from clear that registration of .PERSIANGULF gTLD would resolve, or exacerbate, or significantly affect, that dispute. In any event, the GCC and other Arab interests are and would remain free to seek registration of a domain such as .ARABIANGULF gTLD.

43. It follows that the Objection fails for lack of evidence of the likelihood of material detriment to which registration of the Application would give rise.

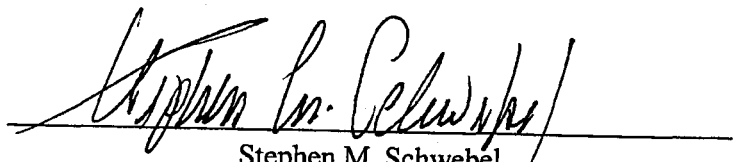
Decision:

In view of the above analysis and reasons, I hereby render the following Expert Determination according to Article 21(d) of the Procedure:

1. GULF COOPERATION COUNCIL's Objection is dismissed;
2. Applicant ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE. TIC. LTD. STI prevails;
3. ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE. TIC. LTD.STI's advance payment on costs shall by refunded by the Centre to ASIA GREEN IT SYSTEM BILGISAYAR SAN. VE. TIC. LTD. STI.

Date: 30 October 2013

Signature:



Stephen M. Schwebel
Expert

Annex 3

The Cooperation Council for the Arab States of the Gulf
Secretariat General

Contact Information Redacted

Ref:ECO20124
Date :06 Mar 2013

The World Intellectual Property Organization
The WIPO Arbitration and Mediation Center

Contact Information Redacted

Subject: letter of Authorization from GCC to TRA of UAE regarding Formal Objection against new gTLD application ".gcc" by GCCIX WLL.

Dear Concerned,

As you are aware The Cooperation Council for the Arab States of the Gulf, as known as Gulf Cooperation Council ("GCC") is globally recognized political and economic union of the Arab states bordering the Arabian Gulf, namely Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates (member states), Gulf Cooperation Council is International Organization known as "GCC" since 1981.

The GCC is filing formal objection on Legal Rights grounds against the new gTLD application ".gcc" ("Application") by GCCIX WLL ("Applicant") in accordance with article 3.2.2.2 of the Applicant Guidebook (AGB).

The GCC in this capacity authorizes the Telecommunications Regulatory Authority ("TRA") of the United Arab Emirates to represent the GCC in all matters related to objecting the subject Application in accordance with article 3.2.2.2 of the Applicant Guidebook and the right to authorize\appoint third parties to do some or all of these authorities and we hereby undertake to ratify and approve all acts taken by TRA and\or the party appointed by TRA.

The United Arab Emirates is a member of the GCC and the TRA is the competent authority within the UAE that oversees and regulate the Telecommunications Sector including domain names in the UAE.

For avoidance of doubt, the objector will remain The Cooperation Council for the Arab States of the Gulf. The following is the contact and address of the TRA authorized persons on behalf of GCC:

Mr. Mohammed Al Ghanim
Director General , Telecommunications Regulatory Authority.
Contact Information Redacted

ANNEX 3

The Cooperation Council for the Arab States of the Gulf
Secretariat General

Contact
Information
Redacted

Ref:ECO20124
Date :06 Mar 2013

Contact Information Redacted

The following is the contact for the purpose of this proceeding only:
Mr. Abdulrahman Almarzouqi
Manager Internet Advancement
Contact Information Redacted

Regards,

Abdulla J .Al-shibli

Duly authorized to sign in this capacity

Asst.Sec.Gen.For Economic Affairs

Date: 06 Mar 2013

ANNEX 3

Annex 4

Charter of the Gulf Cooperation Council (GCC)

25 May 1981

The Cooperation Council - Charter
The Supreme Council - Rules of Procedure
The Ministerial Council - Rules of Procedure
The Commission for the Settlement of Disputes - Rules of Procedure

COOPERATION COUNCIL
FOR
THE ARAB STATES OF THE GULF

The United Arab Emirates
The State of Bahrain
The Kingdom of Saudi Arabia
The Sultanate of Oman
The State of Qatar, and
The State of Kuwait

Being fully aware of the ties of special relations, common characteristics and similar systems founded on the creed of Islam which bind them; and

Desiring to effect coordination, cooperation and integration between them in all fields; and,

Having the conviction that coordination, cooperation, and integration between them serve the sublime objectives of the Arab Nation; and,

Having the conviction that coordination, cooperation, and integration between them serve the sublime objectives of the Arab Nation; and,

In pursuit of the goal of strengthening cooperation and reinforcement of the links between them; and

In an endeavour to complement efforts already begun in all essential areas that concern their peoples and realize their hopes for a better future on the path to unity of their States; and

In conformity with the Charter of the League of Arab States which calls for the realization of closer relations and stronger bonds; and

In order to channel their efforts to reinforce and serve Arab and Islamic causes,

Have agreed as follows:

ARTICLE ONE

The Establishment of the Council

A Council shall be established hereby to be named The Cooperation Council for the Arab States of the Gulf hereinafter referred to as the Cooperation Council (GCC).

ARTICLE TWO

The Cooperation Council shall have its headquarters in Riyadh, Saudi Arabia.

ARTICLE THREE

Cooperation Council Meetings

The Council shall hold its meetings in the state where it has its headquarters, and may convene in any member state.

ARTICLE FOUR

Objectives

The basic objectives of the Cooperation Council are:

To effect coordination, integration and inter-connection between Member States in all fields in order to achieve unity between them.

To deepen and strengthen relations, links and areas of cooperation now prevailing between their peoples in various fields.

To formulate similar regulations in various fields including the following:
Economic and financial affairs
Commerce, customs and communications
Education and culture

To stimulate scientific and technological progress in the fields of industry, mining, agriculture, water and animal resources; to establish scientific research; to establish joint ventures and encourage cooperation by the private sector for the good of their peoples.

ARTICLE FIVE

Council Membership

The Cooperation Council shall be formed of the six states that participated in the Foreign Ministers' meeting held in Riyadh on 4 February 1981.

ARTICLE SIX

Organization of the Cooperation Council

The Cooperation Council shall have the following main organizations:

1. The Supreme Council to which shall be attached the Commission for Settlement of Disputes.

2. The Ministerial Council.

3. The Secretariat General.

Each of these organizations may establish sub-agencies as may be necessary.

ARTICLE SEVEN

Supreme Council

The Cooperation Council shall be formed of the six states that participated in the Foreign Ministers' meeting held in Riyadh on 4 February 1981.

The Supreme Council is the highest authority of the Cooperation Council and shall be formed of heads of member states. Its presidency shall be rotatory based on the alphabetical order of the names of the member states.

The Supreme Council shall hold one regular session every year. Extraordinary sessions may be convened at the request of any member seconded by another member.

The Supreme Council shall hold its sessions in the territories of member states.

A Supreme Council's meeting shall be considered valid if attend by two-thirds of the member states.

ARTICLE EIGHT

The Functions of the Supreme Council

The Supreme Council shall endeavour to realize the objectives of the Cooperation Council, particularly as concerns the following:

Review matters of interest to the member states.

Lay down the higher policy for the Cooperation Council and the basic lines it should follow.

Review the recommendations, reports, studies and joint ventures submitted by the Ministerial Council for approval.

Review reports and studies, which the Secretary-General is charged to prepare.

Approve the bases for dealing with other states and international organizations.

Approve the rules of procedure of the Commission for the Settlement of Disputes and nominate its members.

Appoint the Secretary-General.

Amend the Charter of the Cooperation Council.

Approve the Council's internal rules of procedure.

Approve the budget of the Secretariat General.

ARTICLE NINE

Voting in the Supreme Council

The Cooperation Council shall be formed of the six states that participated in the Foreign Ministers' meeting held in Riyadh on 4 February 1981.

Each member of the Supreme Council shall have one vote.

Resolutions of the Supreme Council in substantive matters shall be carried by unanimous approval of the member states participating in the voting, while resolutions on procedural matters shall be carried by majority vote.

ARTICLE TEN

Commission for the Settlement of Disputes

The Cooperation Council shall have a commission called "The Commission for the Settlement of Disputes" which shall be attached to the Supreme Council.

The Supreme Council shall establish the composition of the Commission for every case on an "ad hoc" basis in accordance with the nature of the dispute.

If a dispute arises over interpretation or implementation of the Charter and such dispute is not resolved within the Ministerial Council or the Supreme Council, the Supreme Council may refer such dispute to the Commission for the Settlement of Disputes.

The Commission shall submit its recommendations or opinion, as applicable, to the Supreme Council for such action as the Supreme Council deems appropriate.

ARTICLE ELEVEN

Ministerial Council

The Ministerial Council shall be formed of the Foreign Ministers of the member states or other delegated ministers. The Council Presidency shall be for the member state, which presided the last ordinary session of the Supreme Council, or if necessary, for the state which is next to preside the Supreme Council.

The Ministerial Council shall convene every three months and may hold extraordinary sessions at the invitation of any member seconded by another member.

The Ministerial Council shall determine the venue of its next session.

A Council's meeting shall be deemed valid if attended by two-thirds of the member states.

ARTICLE TWELVE

Functions of the Ministerial Council

Propose policies, prepare recommendations, studies and projects aimed at developing cooperation and coordination between member states in various fields and adopt the resolutions or recommendations required in this regard.

Endeavour to encourage, develop and coordinate activities existing between member states in all fields. Resolutions adopted in such matters shall be referred to the Ministerial Council for further submission, with recommendations to the Supreme Council for appropriate action.

Submit recommendations to the Ministers concerned to formulate policies whereby the Cooperation Council's resolutions may be put into effect.

Encourage means of cooperation and coordination between the various private sector activities, develop existing cooperation between the member states' Chamber of Commerce and Industry, and encourage the movement within the GCC of workers who are citizens of the member states.

Refer any of the various aspects of cooperation to one or more technical or specialised committee for study and presentation of appropriate recommendations.

Review proposals related to amendments to this Charter and submit appropriate recommendations to the Supreme Council.

Approve Rules of Procedure of both the Ministerial Council and the Secretariat General.

Appoint the Assistant Secretaries-General, as nominated by the Secretary-General, for a period of three year, renewable.

Approve periodic reports as well as internal rules and regulations relating to administrative and financial affairs proposed by the Secretary-General, and submit recommendations to the Supreme Council for approval of the budget of the Secretariat General.

Make arrangements for meetings of the Supreme Council and prepare its agenda.

Review matters referred to it by the Supreme Council.

ARTICLE THIRTEEN

Voting in the Ministerial Council

Every member of the Ministerial Council shall have one vote.

Resolutions of the Ministerial Council in substantive matters shall be carried by unanimous vote of the member state present and participating in the vote, and in procedural matters by majority vote.

ARTICLE FOURTEEN

The Secretariat General

The Secretariat General shall be composed of a Secretary-General who shall be assisted by assistants and a number of staff as required.

The Supreme Council shall appoint the Secretary-General, who shall be a citizen of one of the Cooperation Council states, for a period of three years, which may be renewed once only.

The Secretary-General shall nominate the Assistant Secretaries-General.

The Secretary-General shall appoint the Secretariat General staff from among the citizens of member states, and may not make exceptions without the approval of the Ministerial Council.

The Secretary-General shall be directly responsible for the work of the Secretariat General and the smooth flow of work in its various organizations. He shall represent the Cooperation Council with other parties within the limits of the authority vested in him.

ARTICLE FIFTEEN

Functions of the Secretariat General

The Secretariat General shall:

Prepare studies related to cooperation and coordination, and to integrated plans and programmes for member states' action.

Prepare periodic reports on the work of the Cooperation Council.

Follow up the implementation by the member states of the resolutions and recommendations of the Supreme Council and Ministerial Council.

Prepare reports and studies requested by the Supreme Council or Ministerial Council.

Prepare the draft of administrative and financial regulations commensurate with the growth of the Cooperation Council and its expanding responsibilities.

Prepare the budgets and closing accounts of the Cooperation Council.

Make preparations for meetings and prepare agendas and draft resolutions for the Ministerial Council.

Recommend to the Chairman of the Ministerial Council the convening of an extraordinary session of the Council when necessary.

Any other tasks entrusted to it by the Supreme Council or Ministerial Council.

ARTICLE SIXTEEN

The Secretary-General and the Assistant Secretaries-General and all the Secretariat General staff shall carry out their duties in complete independence and for the joint benefit of the member states.

They shall refrain from any action or behaviour that is incompatible with their duties and from divulging confidential matters relating to their appointments either during or after their tenure of office.

ARTICLE SEVENTEEN

Privileges and Immunities

The Cooperation Council and its organizations shall enjoy on the territories of all member states such legal competence, privileges and immunities as are required to realize their objectives and carry out their functions.

Representatives of the members on the Council, and the Council's employees, shall enjoy such privileges and immunities as are specified in agreements to be concluded for this purpose between the member states. A special agreement shall organize the relation between the Council and the state in which it has its headquarters.

Until such time as the two agreements mentioned in item 2 above are prepared and put into effect, the representatives of the member states in the Cooperation Council and its staff shall enjoy the diplomatic privileges and immunities established for similar organizations.

ARTICLE EIGHTEEN

Budget of the Secretariat General

The Secretariat General shall have a budget to which the member states shall contribute in equal amounts.

ARTICLE NINETEEN

The Implementation of the Charter

This Charter shall go into effect as of the date it is signed by the Head of States of the six member states named in this Charter's preamble.

The original copy of this Charter shall be deposited with the Ministry of Foreign Affairs of the Kingdom of Saudi Arabia which shall act as custodian and shall deliver a true copy thereof to every member state, pending the establishment of the Secretariat General, at which time the latter shall become depository.

ARTICLE TWENTY

Amendments to the Charter

Any member state may request an amendment of this Charter.

Request for Charter amendments shall be submitted to the Secretary-General who shall refer them to the member states at least four months prior to submission to the Ministerial Council.

An amendment shall become effective if unanimously approved by the Supreme Council.

ARTICLE TWENTYONE

Closing Provisions

No reservations may be voiced in respect of the provisions of this Charter.

ARTICLE TWENTYTWO

The Secretariat General shall arrange to deposit and register copies of this Charter with the League of Arab States and the United Nations, by resolution of the Ministerial Council.

This Charter is signed on one copy in the Arabic language at Abu Dhabi City, United Arab Emirates, on 21 Rajab 1401 corresponding to 25 May 1981.

The United Arab Emirates
The State of Bahrain
The Kingdom of Saudi Arabia
The Sultanate of Oman
The State of Qatar
The State of Kuwait

Retrieved from: http://www.gccsg.org/eng/index.php?action=Sec-Show&ID=3 – 19.8.2009

Annex 5

Iran threatens to sue Google for not labeling Persian Gulf

By **Josh Levs**, CNN
updated 12:49 PM EDT, Fri May 18, 2012

Iranian Foreign Ministry spokesman Ramin Mehmanparast, shown in a file photo, says Google has been "treated as a plaything."

STORY HIGHLIGHTS

- Google tells CNN this body of water was never labeled
- Spats over naming have cropped up from "Malvinas" to "Derry" to "Kampuchea"
- Iran's Foreign Ministry says Google is being used by the nation's enemies

(CNN) – Iran is taking on one of the world's biggest Internet giants, threatening to sue over something that is not on its maps.

On state-run Press TV, the Iranian regime warns it may take legal action against Google for not labeling the Persian Gulf.

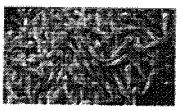
It's the latest volley in what one expert calls a "war of words" that has raged for decades over the waterway that borders Iran and several Arab countries.

Iran previously lashed out against the U.S. military for calling the waterway the Arabian Gulf.

In a statement Thursday, the Iranian regime accused Google of carrying out efforts of Iran's enemies.

"Toying with modern technologies in political issues is among the new measures by the enemies against Iran, (and) in this regard, Google has been treated as a plaything," Foreign Ministry spokesman Ramin Mehmanparast said Thursday, according to state-run Press TV.

More from CNN:



Extreme shrimp might hold clues to alien life, NASA says

Ronaldo strikes again, Liverpool stumble

He added that "omitting the name Persian Gulf is (like) playing with the feelings and realities of the Iranian nation."

On state-run news agency IRNA, Iranian officials accused Google of having removed the words "Persian Gulf."

But a Google spokesperson told CNN the body of water was never labeled.

"It's just simply the case that we don't have a label for every body of water," the spokesperson said, speaking anonymously on the issue in keeping with company policy.

The spokesperson would not name any other specific areas that are not labeled.

If you type "Persian Gulf" into Google Maps, the resulting map shows you the Persian Gulf but does not label it. Nearby bodies of water -- including the Gulf of Oman, Arabian Sea, Gulf of Aden and Red Sea -- are labeled.

Google uses the marker "A" to show you whichever location you requested. The column to the left of the map does say that the A is in the "Persian Gulf."

Anger over the lack of a label on the map has spread not just within Iran's government, but among the population and Iranians living around the world. At least nine pages on Facebook are dedicated to the issue, including "Hey Google, put Persian Gulf back on the map" and "Boycott Google for removing Persian Gulf from the maps."

There have also been times that Arabs complained the waterway should be called the Arabian Gulf, says Clive Holes, a professor at the University of Oxford who specializes in language and the contemporary Arab world.

"It's a war of words," he says.

"These are symbolic things" and involve "a lot of emotion," Holes said.

The National Iranian American Council has complained that the term "Arabian Gulf" began "as Pan-Arabism propaganda and was later used by Saddam Hussein to exploit ethnic rivalries in support of his regional ambitions."

In 2010, the U.S. Navy was bombarded with thousands of angry, pro-Iranian messages on its Facebook page.

The Navy responded with its own extensive statement on Facebook.

"We are aware of the long and proud history of the Persian people," the Navy said at the time. It added that "Arabian Gulf" is used for its forces, but that in other respects, including nautical charts and publications, "the historic name of Persian Gulf is used."

Iran has gone after other groups before for either using the term "Arabian Gulf" or simply calling it "the gulf."

The country banned the British publication The Economist once in 2006 for calling the waterway "the Gulf," and it launched protests against the Louvre museum in Paris when its guides did the same, the British newspaper The Guardian reported.

Google would not say whether it has had direct contact with Iranian authorities on the issue, nor whether it has received many complaints.

Holes says Google is "boxing clever" -- making a smart move -- by not labeling something controversial. "They don't want to annoy anybody."

Google Maps has found itself in controversial terrain before.

In November 2010, a Nicaraguan general cited Google's map of the border with Costa Rica to justify a reported raid in a disputed area.

The dispute over the term "Persian Gulf" is a reminder that what a place is called can have powerful political repercussions.

While much of the world refers to the Asian nation west of Thailand as Myanmar, the U.S. government still calls it Burma.

The State Department explains that the ruling junta changed the name to Myanmar in 1989, but some in the democratic opposition don't recognize the change. "Out of support for the democratic opposition, and its victory in the 1990 election, the U.S. government likewise uses 'Burma,'" the State Department website says.

The United States also does not use the name Kampuchea, instead calling that country Cambodia. The State Department says the Khmer Rouge turned Cambodia, "which it called Democratic Kampuchea (DK)," into "a land of horror."

In Israel, some officials refer to the West Bank as Judea and Samaria -- biblical references used to highlight Jewish history on the land and bolster a view that it should be part of modern Israel.

In Northern Ireland, nationalists and unionists have battled for years over whether to call an area Derry or Londonderry.

Argentina and much of Latin America call the Falklands the Malvinas. Argentina presses claims to the islands 30 years after losing a war with Britain over them.

"You kind of own something if it's called the way you want it called," Holes, the Oxford professor said, adding that there is a "kind of a feeling that who you are is tied into issues of how you name things."

Comments for this thread are now closed.

2203 Comments CNN

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citizensp • 3 years ago
The Iranians should be more concerned with replacing the Arab regime that has destroyed their country over the past 30+ years then what name is used for the Persian Gulf.
70 • Share ›

Christopher Minick → citizensp • 3 years ago
Egyptianshash, I think he is implying that persian culture was destroyed by invading Muslim Arabs. I suppose because Persia existed before the religion was invented
21 • Share ›

CyrusIII → citizensp • 3 years ago
I know what you mean, but it is very important to us that the historic and real name of Persian Gulf is used.
20 • Share ›

oldguy68 → citizensp • 3 years ago
You probably have to go back to Xerxes to find a regime that wasn't screwing up Iran. The Shah was no jewel either
15 • Share ›

truthhurts99 → citizensp • 3 years ago
Hey Iran.....Arabian Gulf, Arabian Gulf, Arabian Gulf !
9 • Share ›

c0r3y → citizensp • 3 years ago
Funny thing is google is more powerful than Iran!! I bet they could, with some hackers, cause Iran some serious problems and Iran couldn't do cr@p. "don't be evil Iran or else!"
7 • Share ›

viaquest → citizensp • 3 years ago
@ CyrusIII , what on Earth makes you think anyone gives a pigs ear (ya like that) what Iranians think, your leadership has ruined all credibility Iran ever had , which wasn't much anyway
2 • Share ›

spurtulous → citizensp • 3 years ago
the Iranian government is suing not the people. I always learned it as the Persian Gulf but today we need to irk Iraq by calling it something else... sure beats invading for no reason at all
3 • Share ›

AndersonClay → citizensp • 3 years ago
And the United States of America, somehow, still finds itself in a position to name foreign land...
How ARROGANT and iddiotic!
2 • Share ›

Iranian74 → citizensp • 3 years ago

Annex 6

United Arab Emirates

هيئة تنظيم الاتصالات TRA
TELECOMMUNICATIONS REGULATORY AUTHORITY

Date: 14 October 2012
Ref.: TRA/DG/EDPP/6234

Dr. Stephen Crocker
Chairman of the Board of Director
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
USA

Phone: +1 310 301 5800
FAX: +1 310 823 8649

Heather Dryden
Chair, Governmental Advisory Committee

New gTLD Application ".PERSIANGULF" by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

Dear Dr. Crocker and Ms. Heather,

This has reference to the new gTLD application ".persiangulf" ("application") by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti ("applicant"). The TRA on behalf of the Government of UAE would like to thank the ICANN and Government Advisory Committee for providing the continuous support and opportunity for governments to express their opinion in matters concerning public policy issues in the Internet and Domain Name fields.

The Government of UAE would like to express its serious concerns toward ".persiangulf" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in two areas as highlighted below:

(1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.

The applied for new gTLD string "the Persian Gulf" refers to the body of water separating the Arabian Peninsula from the Iranian plateau (The Arabian Gulf).

ص.ب 26662 أبوظبي الإمارات العربية المتحدة هاتف
P.O Box 26662, Abu Dhabi, United Arab Emirates ناكس F +971 2 611 8229
tra.gov.ae
Federal Authority | هيئة اتحادية

ANNEX 6

Throughout the history, this body of water has been known by different names including among others Arabian Gulf, Basreh Gulf, Ghatif Gulf, Bahrain Gulf. The most dominant names that are currently used for this body of water are Arabian Gulf and Persian Gulf.

The naming of the Arabian Gulf has been controversial and debatable subject in various national and international venues and levels. Many countries, intergovernmental organizations, publications, literatures, media, maps and organizations recognize the name Arabian Gulf. The Arab countries bordering the Arabian Gulf including the UAE only recognize the name "Arabian Gulf".

There have been several attempts also by different organization to resolve this issue by either referring to both names of the gulf, or some by referring to a new neutral name like "the Gulf" or by removing the reference to the gulf altogether. For example in 2004 the National Geographic Society in its Atlas mentioned both Persian Gulf and Arabian Gulf. Google used to have both names in their product "Google Maps" however in 2012, Google have removed reference to both names.

This letter does not intend to bring up the debates and arguments around naming the gulf here. However it is important to note that there is no general consensus on a single unified name for the Arabian Gulf. It is also important to note that the United Nations Expert Group on Geographical Names issued a resolution no **III/20 "Names of features beyond a single sovereignty"** which basically recommends having single name of a territory beyond single sovereignty. Here is an excerpt from the resolution:

"The Conference, Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavour, as far as possible, to reach agreement on fixing a single name for the feature concerned;

2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice..."

Noting point 2 in resolution III/20, it would be unfair and inacceptable to approve the application of .persiangulf considering there is no equivalent application for

tra.gov.ae
ص.ب. 26662، أبوظبي، الإمارات العربية المتحدة
PO Box 26662, Abu Dhabi, United Arab Emirates
ت +971 2 611 8229 فاكس
Federal Authority | هيئة الطيران المدني

ANNEX 6

the name .arabiangulf while the name "Arabian Gulf" is widely used and accepted.

Therefore the string ".persiangulf" **should not be allowed to be registered** as a gTLD unless there is consensus on a single name recognized by all countries bordering the Arabian Gulf.

(2) Lack of community involvement and support

Furthermore, the applicant mentions the following in response to Q18(a):

"The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude .... it is still well-known across the world, as is its location.

...

A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce

...

The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources... The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf.

"

This is clearly shows that the applicant is targeting a confined community which is people and organizations bordering the gulf which basically covers the 8 countries namely Bahrain, Iran, Iraq, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates.

To the best of our knowledge the applicant did not consult with the majority of the targeted community in regards to launch of the proposed TLD, its strategy and policies.

The applicant did not receive any endorsement or support from the community or any of its organizations, or any governmental or non-governmental organization within this community.

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Given that there is no consensus on the name of the gulf and considering that majority of the targeted community recognize the name "Arabian Gulf" as oppose to the name "Persian Gulf" it would limit the interest of the targeted community to the proposed name space. This will also impact the sustainability and growth of the name space.

For the above reasons, the TRA on behalf of the government of UAE would like to **raise its disapproval and non-endorsement** to this application and request the ICANN and the new gTLD program evaluators to not approve this application.

The TRA on behalf of government of UAE would like to also **issue an Early Warning** based on the above concerns to the applicant and demand that the applicant withdraw its application for ".persiangulf" as a remediation step.

Finally the TRA requests the GAC to study and raise this issue in order to be included in the **"GAC Advice"** to the ICANN Board concerning new gTLD program.

Sincerely,

Mohammed Al Ghanim
Director General

هيئة تنظيم الاتصالات TRA
TELECOMMUNICATIONS REGULATORY AUTHORITY

ص.ب 26662، أبوظبي، الإمارات العربية المتحدة هاتف T +971 2 626 9999
tra.gov.ae PO Box 26662, Abu Dhabi, United Arab Emirates فاكس F +971 2 611 8229
Federal Authority | هيئة اتحادية

ANNEX 6

Annex 7

22 October 2012
TOD/ICS/1012/051

Dr. Stephen Crocker
Chairman of the Board of Director
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
USA
Phone: +1 310 301 5800
FAX: +1 310 823 8649

Heather Dryden
Chair, Governmental Advisory Committee

Dear Dr. Crocker and Ms. Heather,

Subject: new gTLD application ".PERSIANGULF" by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

The TRA on behalf of The Government of Bahrain would like to express its gratitude and thankfulness to ICANN for its continuous and valuable support. Additionally, TRA appreciates the opportunities provided by ICANN and The Government Advisory Committee for permitting the governments to express their opinions and concerns with all matters linked to the Internet and Domain Name fields.

This letter has reference to the new gTLD application ".persiangulf" ("application") by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti ("applicant"). The government of Bahrain would like to express its serious concerns toward ".persiangulf" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in two areas as highlighted below:

(1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.

The applied for new gTLD string "the Persian Gulf" refers to the body of water separating the Arabian Peninsula from the Iranian plateau (The Arabian Gulf). Throughout the history, this body of water has been known by different names including among others Arabian Gulf, Basreh Gulf, Ghatif Gulf, Bahrain Gulf. The most dominant names that are currently used for this body of water are Arabian Gulf and Persian Gulf.

The naming of the Arabian Gulf has been controversial and debatable subject in various national and international venues and levels. Many countries, intergovernmental organizations, publications, literatures, media, maps and organizations recognize the name Arabian Gulf. The Arab countries bordering the Arabian Gulf including Bahrain only recognize the name "Arabian Gulf".

There have been several attempts also by different organization to resolve this issue by either referring to both names of the gulf, or some by referring to a new neutral name like "the Gulf" or by removing the reference to the gulf altogether. For example in 2004 the National Geographic Society in its Atlas mentioned both Persian Gulf and Arabian Gulf. Google used to have both names in their product "Google Maps" however in 2012, Google have removed reference to both names.

This letter does not intend to bring up the debates and arguments around naming the gulf here. However it is important to note that there is no general consensus on a single unified name for the Arabian Gulf. It is also important to note that the United Nations Expert Group on Geographical Names issued a **resolution no III/20 "Names of features beyond a single sovereignty"** which basically recommends having single name of a territory beyond single sovereignty. Here is an excerpt from the resolution:

"The Conference, Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavor, as far as possible, to reach agreement on fixing a single name for the feature concerned;

2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice..."

Noting point 2 in resolution III/20, it would be unfair and inacceptable to approve the application of .persiangulf considering there is no equivalent application for the name .arabiangulf while the name "Arabian Gulf" is widely used and accepted.

Therefore **the string ".persiangulf" should not be allowed to be registered** as a gTLD unless there is consensus on a single name recognized by all countries bordering the Arabian Gulf.

(2) Lack of community involvement and support

Furthermore, the applicant mentions the following in response to Q18(a):

"The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude .... it is still well-known across the world, as is its location.

...

A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce

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"

This is clearly shows that the applicant is targeting a confined community which is people and organizations bordering the gulf which basically covers the 8 countries namely Bahrain, Iran, Iraq, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates.

To the best of our knowledge the applicant did not consult with the majority of the targeted community in regards to launch of the proposed TLD, its strategy and policies.

The applicant did not receive any endorsement or support from the community or any of its organizations, or any governmental or non-governmental organization within this community.

Given that there is no consensus on the name of the gulf and considering that majority of the targeted community recognize the name "Arabian Gulf" as oppose to the name "Persian Gulf" it would limit the interest of the targeted community to the proposed name space. This will also impact the sustainability and growth of the name space.

For the above reasons, the TRA on behalf of the government of Bahrain would like to **raise its disapproval and non-endorsement to this application** and request the ICANN and the new gTLD program evaluators to not approve this application.

The TRA on behalf of government of Bahrain would like to also issue an **Early Warning** based on the above concerns to the applicant and demand that the applicant withdraw its application for ".persiangulf" as a remediation step.

Finally, the TRA requests the GAC to study and raise this issue in order to be included in the "GAC Advice" to the ICANN Board concerning new gTLD program.

Yours sincerely,

Mohammed Bubashait
General Director

هيئة تنظيم الاتصالات
Telecommunications Regulatory Authority

cc:

- Dr. Mohammed Al-Amer, Chairman of TRA Bahrain
- Eng. Mahmood Sayyar, Director General of the GCC Telecommunications Bureau.

Annex 8

Contact Information Redacted

Date: 23 October 2012

Ref : ICT/266 /2012

To : Heather Dryden
Chair, Governmental Advisory Committee

Cc : Dr. Stephen Crocker
Chairman of the Board of Director
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536
USA

Subject: new gTLD application ".PERSIANGULF" by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

Dear Dr. Crocker and Ms. Heather,

This has reference to the new gTLD application ".persiangulf" ("application") by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti ("applicant"). ictQATAR on behalf of the Government of the State of Qatar would like to thank the ICANN and Government Advisory Committee for providing the continuous support and opportunity for governments to express their opinion in matters concerning public policy issues in the Internet and Domain Name fields.

The Government of the State of Qatar would like to express its serious concerns toward ".persiangulf" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in two areas as highlighted below:

1. **The application for the new gTLD is problematic and refers to a geographical place with disputed name.**

The applied for new gTLD string "the Persian Gulf" refers to the body of water separating the Arabian Peninsula from the Iranian plateau (The Arabian Gulf). Throughout the history, this body of water has been known by different names including

among others Arabian Gulf, Basreh Gulf, Ghatif Gulf, Bahrain Gulf. The most dominant names that are currently used for this body of water are Arabian Gulf and Persian Gulf.

The naming of the Arabian Gulf has been controversial and debatable subject in various national and international venues and levels. Many countries, intergovernmental organizations, publications, literatures, media, maps and organizations recognize the name Arabian Gulf. The Arab countries bordering the Arabian Gulf including Qatar only recognize the name "Arabian Gulf".

There have been several attempts also by different organization to resolve this issue by either referring to both names of the gulf, or some by referring to a new neutral name like "the Gulf" or by removing the reference to the gulf altogether. For example in 2004 the National Geographic Society in its Atlas mentioned both Persian Gulf and Arabian Gulf. Google used to have both names in their product "Google Maps" however in 2012, Google have removed reference to both names.

This letter does not intend to bring up the debates and arguments around naming the gulf here. However it is important to note that there is no general consensus on a single unified name for the Arabian Gulf. It is also important to note that the United Nations Expert Group on Geographical Names issued a resolution no **III/20 "Names of features beyond a single sovereignty"** which basically recommends having single name of a territory beyond single sovereignty. Here is an excerpt from the resolution:

"The Conference, Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavour, as far as possible, to reach agreement on fixing a single name for the feature concerned;

2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice..."

Noting point 2 in resolution III/20, it would be unfair and inacceptable to approve the application of .persiangulf considering there is no equivalent application for the name .arabiangulf while the name "Arabian Gulf" is widely used and accepted.

Therefore the string ".persiangulf" **should not be allowed to be registered** as a gTLD unless there is consensus on a single name recognized by all countries bordering the Arabian Gulf.

2. Lack of community involvement and support

Furthermore, the applicant mentions the following in response to Q18(a):

"The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude .... it is still well-known across the world, as is its location.

...

A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce

...

The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources... The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf.

"

This is clearly shows that the applicant is targeting a confined community which is people and organizations bordering the gulf which basically covers the 8 countries namely Bahrain, Iran, Iraq, Kuwait, Oman, Qatar, Saudi Arabia and United Arab Emirates.

To the best of our knowledge the applicant did not consult with the majority of the targeted community in regards to launch of the proposed TLD, its strategy and policies.

The applicant did not receive any endorsement or support from the community or any of its organizations, or any governmental or non-governmental organization within this community.

Given that there is no consensus on the name of the gulf and considering that majority of the targeted community recognize the name "Arabian Gulf" as oppose to the name "Persian Gulf" it would limit the interest of the targeted community to the proposed name space. This will also impact the sustainability and growth of the name space.

For the above reasons, ictQATAR on behalf of the government of Qatar would like to **raise its disapproval and non-endorsement** to this application and request the ICANN and the new gTLD program evaluators to not approve this application.

ictQATAR on behalf of government of Qatar would like to also **issue an Early Warning** based on the above concerns to the applicant and demand that the applicant withdraw its application for ".persiangulf" as a remediation step.

Finally ictQATAR requests the GAC to study and raise this issue in order to be included in the **"GAC Advice"** to the ICANN Board concerning new gTLD program.

Yours Sincerely,

Hessa AlJaber

Dr. Hessa Al-Jaber
Secretary General

Annex 9

مكتب الرئيس التنفيذي
Chief Executive Office

سلطنة عُمان
Sultanate of Oman

هيئة تنظيم الاتصالات
Telecommunications Regulatory Authority

Date: /10/2012
Ref.: TRA/TP/ /2012

Dr. Stephen Crocker
Chairman of the Board of Director
Internet Corporation for Assigned Names and Numbers (ICANN)

Heather Dryden
Chair, Governmental Advisory Committee

Subject: new gTLD application ".PERSIANGULF" by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

This is in reference to the new gTLD application ".persiangulf" ("application") by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti ("applicant"). The TRA on behalf of the Government of Oman would like to thank the ICANN and Government Advisory Committee for providing the continuous support and opportunity for governments to express their opinion in matters concerning public policy issues in the Internet and Domain Name fields.

The Government of Oman would like to express its serious concerns toward ".persiangulf" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in two areas as highlighted below:

(1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.

The applied for new gTLD string "the Persian Gulf" refers to the body of water separating the Arabian Peninsula from the Iranian plateau (The Arabian Gulf). Throughout the history, this body of water has been known by different names including among others Arabian Gulf, Basreh Gulf, Ghatif Gulf, Bahrain Gulf. The most dominant names that are currently used for this body of water are Arabian Gulf and Persian Gulf.

The naming of the Arabian Gulf has been controversial and debatable subject in various national and international venues and levels. Many countries, intergovernmental organizations, publications, literatures, media, maps and organizations recognize the name Arabian Gulf. The Arab countries bordering the Arabian Gulf including Oman only recognize the name "Arabian Gulf".

There have been several attempts also by different organization to resolve this issue by either referring to both names of the gulf, or some by referring to a new neutral name like "the Gulf" or by removing the reference to the gulf altogether. For example in 2004 the National Geographic Society in its Atlas mentioned both Persian Gulf and Arabian Gulf. Google used to have both names in their product "Google Maps" however in 2012, Google have removed reference to both names.

This letter does not intend to bring up the debates and arguments around naming the gulf here. However it is important to note that there is no general consensus on a single unified name for the Arabian Gulf. It is also important to note that the United Nations Expert Group on Geographical Names issued a resolution no **III/20 "Names of features beyond a single sovereignty"** which basically recommends having single name of a territory beyond single sovereignty. Here is an excerpt from the resolution:

"The Conference, Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavour, as far as possible, to reach agreement on fixing a single name for the feature concerned;

2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice..."

Noting point 2 in resolution III/20, it would be unfair and unacceptable to approve the application of .persiangulf considering there is no equivalent

application for the name .arabiangulf while the name "Arabian Gulf" is widely used and accepted.

Therefore the string ".persiangulf" **should not be allowed to be registered** as a gTLD unless there is consensus on a single name recognized by all countries bordering the Arabian Gulf.

(2) Lack of community involvement and support

Furthermore, the applicant mentions the following in response to Q18(a):

"The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude .... it is still well-known across the world, as is its location.

A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce

...

The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources... The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf.

"

This clearly shows that the applicant is targeting a confined community which is people and organizations bordering the gulf which basically covers the 8 countries namely Bahrain, Iran, Iraq, Kuwait, United Arab Emirates, Qatar, Saudi Arabia and Oman.

To the best of our knowledge the applicant did not consult with the majority of the targeted community in regards to launch of the proposed TLD, its strategy and policies.

The applicant did not receive any endorsement or support from the community or any of its organizations, or any governmental or non-governmental organization within this community.

Given that there is no consensus on the name of the gulf and considering that majority of the targeted community recognize the name "Arabian Gulf" as oppose to the name "Persian Gulf" it would limit the interest of the targeted community to the proposed name space. This will also impact the sustainability and growth of the name space.

For the above reasons, the TRA on behalf of the government of Oman would like to **raise its disapproval and non-endorsement** to this application and request the ICANN and the new gTLD program evaluators not to approve this application.

The TRA on behalf of government of Oman would like to also **issue an Early Warning** based on the above concerns to the applicant and demand that the applicant withdraw its application for ".persiangulf" as a remediation step.

Finally the TRA requests the Governmental Advisory Committee of ICANN (GAC) to study and raise this issue in order to be included in the **"GAC Advice"** to the ICANN Board concerning new gTLD program.

Best Regards,

Dr. Hamad Salim Al Rawahi
Chief Executive

Annex 10

GAC Early Warning – Submittal Persiangulf-AE-55439

Application ID:	1-2128-55439
Entity/Applicant Name:	Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.
String:	PERSIANGULF
Early Warning Issue Date:	20 November 2012

Early Warning Description – This will be posted publicly:

The governments of Bahrain, Oman, Qatar and UAE would like to express its serious concerns toward ".persiangulf" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in two areas as highlighted below:

(1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.

(2) Lack of community involvement and support

Reason/Rationale for the Warning – This will be posted publicly:

(1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.

The applied for new gTLD string "the Persian Gulf" refers to the body of water separating the Arabian Peninsula from the Iranian plateau (The Arabian Gulf). Throughout the history, this body of water has been known by different names including among others Arabian Gulf, Basreh Gulf, Ghatif Gulf, Bahrain Gulf. The most dominant names that are currently used for this body of water are Arabian Gulf and Persian Gulf.

The naming of the Arabian Gulf has been controversial and debatable subject in various national and international venues and levels. Many countries, intergovernmental organizations, publications, literatures, media, maps and organizations recognize the name Arabian Gulf. The Arab countries bordering the Arabian Gulf including the UAE only recognize the name "Arabian Gulf".

There have been several attempts also by different organization to resolve this issue by either referring to both names of the gulf, or some by referring to a new neutral name like "the Gulf" or by removing the reference to the gulf altogether. For example in 2004 the National Geographic Society in its Atlas mentioned both Persian Gulf and Arabian Gulf. Google used to have both names in their product "Google Maps" however in 2012, Google have removed reference to both names.

This letter does not intend to bring up the debates and arguments around naming the gulf here. However it is important to note that there is no general consensus on a single unified name for the Arabian Gulf. It

is also important to note that the United Nations Expert Group on Geographical Names issued a resolution no **III/20 "Names of features beyond a single sovereignty"** which basically recommends having single name of a territory beyond single sovereignty. Here is an excerpt from the resolution:

"The Conference, Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavour, as far as possible, to reach agreement on fixing a single name for the feature concerned;

2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice..."

Noting point 2 in resolution III/20, it would be unfair and inacceptable to approve the application of .persiangulf considering there is no equivalent application for the name .arabiangulf while the name "Arabian Gulf" is widely used and accepted.

Therefore the string ".persiangulf" **should not be allowed to be registered** as a gTLD unless there is consensus on a single name recognized by all countries bordering the Arabian Gulf.

(2) Lack of community involvement and support

Furthermore, the applicant mentions the following in response to Q18(a):

"The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude .... it is still well-known across the world, as is its location.

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A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce

...

The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources... The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf.

"

This is clearly shows that the applicant is targeting a confined community which is people and organizations bordering the gulf which basically covers the 8 countries namely Bahrain, Iran, Iraq, Kuwait,

Oman, Qatar, Saudi Arabia and United Arab Emirates.

To the best of our knowledge the applicant did not consult with the majority of the targeted community in regards to launch of the proposed TLD, its strategy and policies.

The applicant did not receive any endorsement or support from the community or any of its organizations, or any governmental or non-governmental organization within this community.

Given that there is no consensus on the name of the gulf and considering that majority of the targeted community recognize the name "Arabian Gulf" as oppose to the name "Persian Gulf" it would limit the interest of the targeted community to the proposed name space. This will also impact the sustainability and growth of the name space.

For the above reasons, the governments of Bahrain, Oman, Qatar and UAE would like to **raise its disapproval and non-endorsement** to this application and request the ICANN and the new gTLD program evaluators to not approve this application.

Possible Remediation steps for Applicant – This will be posted publicly:

The applicant should withdraw their application based on the information provided above

Further Notes from GAC Member(s) (Optional) – This will be posted publicly:

INFORMATION FOR APPLICANTS

About GAC Early Warning

The GAC Early Warning is a notice only. It is not a formalobjection, nor does it directly lead to a process that canresult in rejection of the application. However, a GAC EarlyWarning should be taken seriously as it raises the likelihoodthat the application could be the subject of GAC Adviceon New gTLDs or of a formal objection at a later stage in theprocess. Refer to section 1.1.2.4 of the Applicant Guidebook (http://newgtlds.icann.org/en/applicants/agb) for more information on GAC Early Warning.

Instructions if you receive the Early Warning

ICANN strongly encourages you work with relevant parties as soon as possible to address the concerns voiced in the GAC Early Warning.

Asking questions about your GAC Early Warning

If you have questions or need clarification about your GAC Early Warning, please contact gacearlywarning@gac.icann.org.As highlighted above, ICANN strongly encourages you to contact gacearlywarning@gac.icann.org as soon as practicableregarding the issues identified in the Early Warning.

Continuing with your application

If you choose to continue with the application, then the "Applicant's Response" section below should be completed. In this section, you should notify the GAC of intended actions, including the expected completion date. This completed form should then be sent to gacearlywarning@gac.icann.org.If your remediation steps involve submitting requests for changes to your application, see the change request process at http://newgtlds.icann.org/en/applicants/customer-service/change-requests.

In the absence of a response, ICANN will continue to process the application as submitted.

Withdrawing your application

If you choose to withdraw your application within the 21-day window to be eligible for a refund of 80% of the evaluation fee (USD 148,000),please follow the withdrawal process published at http://newgtlds.icann.org/en/applicants/customer-service/withdrawal-refund. Note that an application can still be withdrawn after the 21-day time period; however, the available refund amount is reduced. See section 1.5 of the Applicant Guidebook.

For questions please contact: gacearlywarning@gac.icann.org

Applicant Response:

Annex 11

GAC PRINCIPLES REGARDING NEW gTLDs

Presented by the Governmental Advisory Committee
March 28, 2007

1. Preamble

1.1 The purpose of this document is to identify a set of general public policy principles related to the introduction, delegation and operation of new generic top level domains (gTLDs). They are intended to inform the ICANN Board of the views of the GAC regarding public policy issues concerning new gTLDs and to respond to the provisions of the World Summit on the Information Society (WSIS) process, in particular *"the need for further development of, and strengthened cooperation among, stakeholders for public policies for generic top-level domains (gTLDs)"*[1] and those related to the management of Internet resources and enunciated in the Geneva and Tunis phases of the WSIS.

1.2 These principles shall not prejudice the application of the principle of national sovereignty. The GAC has previously adopted the general principle that the Internet naming system is a public resource in the sense that its functions must be administered in the public or common interest. The WSIS Declaration of December 2003 also states that *"policy authority for Internet-related public policy issues is the sovereign right of States. They have rights and responsibilities for international Internet-related public policy issues."*[2]

1.3 A gTLD is a top level domain which is not based on the ISO 3166 two-letter country code list[3]. For the purposes and scope of this document, new gTLDs are defined as any gTLDs added to the Top Level Domain name space after the date of the adoption of these principles by the GAC.

1.4 In setting out the following principles, the GAC recalls ICANN's stated core values as set out in its by-laws:

> *a. Preserving and enhancing the operational stability, reliability, security, and global interoperability of the Internet.*
>
> *b. Respecting the creativity, innovation, and flow of information made possible by the Internet by limiting ICANN's activities to those matters within ICANN's mission requiring or significantly benefiting from global coordination.*
>
> *c. To the extent feasible and appropriate, delegating coordination functions to or recognizing the policy role of other responsible entities that reflect the interests of affected parties.*

[1] See paragraph 64 of the WSIS Tunis Agenda, at http://www.itu.int/wsis/docs2/tunis/off/6rev1.html
[2] See paragraph 49.a) of the WSIS Geneva declaration at http://www.itu.int/wsis/docs/geneva/official/dop.html
[3] See: http://www.icann.org/general/glossary.htm#G

d. Seeking and supporting broad, informed participation reflecting the functional, geographic, and cultural diversity of the Internet at all levels of policy development and decision-making.

e. Where feasible and appropriate, depending on market mechanisms to promote and sustain a competitive environment.

f. Introducing and promoting competition in the registration of domain names where practicable and beneficial in the public interest.

g. Employing open and transparent policy development mechanisms that (i) promote well-informed decisions based on expert advice, and (ii) ensure that those entities most affected can assist in the policy development process.

h. Making decisions by applying documented policies neutrally and objectively, with integrity and fairness.

i. Acting with a speed that is responsive to the needs of the Internet while, as part of the decision-making process, obtaining informed input from those entities most affected.

j. Remaining accountable to the Internet community through mechanisms that enhance ICANN's effectiveness.

k. *While remaining rooted in the private sector, recognizing that governments and public authorities are responsible for public policy and duly taking into account governments' or public authorities' recommendations.*

2. Public Policy Aspects related to new gTLDs

When considering the introduction, delegation and operation of new gTLDs, the following public policy principles need to be respected:

Introduction of new gTLDs

2.1 New gTLDs should respect:

a) The provisions of the Universal Declaration of Human Rights[4] which seek to affirm *"fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women".*

b) The sensitivities regarding terms with national, cultural, geographic and religious significance.

2.2 ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with the relevant governments or public authorities.

[4] See http://www.un.org/Overview/rights.html

2.3 The process for introducing new gTLDs must make proper allowance for prior third party rights, in particular trademark rights as well as rights in the names and acronyms of inter-governmental organizations (IGOs).

2.4 In the interests of consumer confidence and security, new gTLDs should not be confusingly similar to existing TLDs. To avoid confusion with country-code Top Level Domains no two letter gTLDs should be introduced.

Delegation of new gTLDs

2.5 The evaluation and selection procedure for new gTLD registries should respect the principles of fairness, transparency and non-discrimination. All applicants for a new gTLD registry should therefore be evaluated against transparent and predictable criteria, fully available to the applicants prior to the initiation of the process. Normally, therefore, no subsequent additional selection criteria should be used in the selection process.

2.6 It is important that the selection process for new gTLDs ensures the security, reliability, global interoperability and stability of the Domain Name System (DNS) and promotes competition, consumer choice, geographical and service-provider diversity.

2.7 Applicant registries for new gTLDs should pledge to:

a) Adopt, before the new gTLD is introduced, appropriate procedures for blocking, at no cost and upon demand of governments, public authorities or IGOs, names with national or geographic significance at the second level of any new gTLD.

b) Ensure procedures to allow governments, public authorities or IGOs to challenge abuses of names with national or geographic significance at the second level of any new gTLD.

2.8 Applicants should publicly document any support they claim to enjoy from specific communities.

2.9 Applicants should identify how they will limit the need for defensive registrations and minimise cyber-squatting that can result from bad-faith registrations and other abuses of the registration system

Operation of new gTLDs

2.10 A new gTLD operator/registry should undertake to implement practices that ensure an appropriate level of security and stability both for the TLD itself and for the DNS as a whole, including the development of best practices to ensure the accuracy, integrity and validity of registry information.

2.11 ICANN and a new gTLD operator/registry should establish clear continuity plans for maintaining the resolution of names in the DNS in the event of registry failure.

These plans should be established in coordination with any contingency measures adopted for ICANN as a whole.

2.12 ICANN should continue to ensure that registrants and registrars in new gTLDs have access to an independent appeals process in relation to registry decisions related to pricing changes, renewal procedures, service levels, or the unilateral and significant change of contract conditions.

2.13 ICANN should ensure that any material changes to the new gTLD operations, policies or contract obligations be made in an open and transparent manner allowing for adequate public comment.

2.14 The GAC WHOIS principles are relevant to new gTLDs.

3. Implementation of these Public Policy Principles

3.1 The GAC recalls Article XI, section 2, no. 1 h) of the ICANN Bylaws, which state that the ICANN Board shall notify the Chair of the Governmental Advisory Committee in a timely manner of any proposal raising public policy issues. Insofar, therefore, as these principles provide guidance on GAC views on the implementation of new gTLDs, they are not intended to substitute for the normal requirement for the ICANN Board to notify the GAC of any proposals for new gTLDs which raise public policy issues.

3.2 ICANN should consult the GAC, as appropriate, regarding any questions pertaining to the interpretation of these principles.

3.3 If individual GAC members or other governments express formal concerns about any issues related to new gTLDs, the ICANN Board should fully consider those concerns and clearly explain how it will address them.

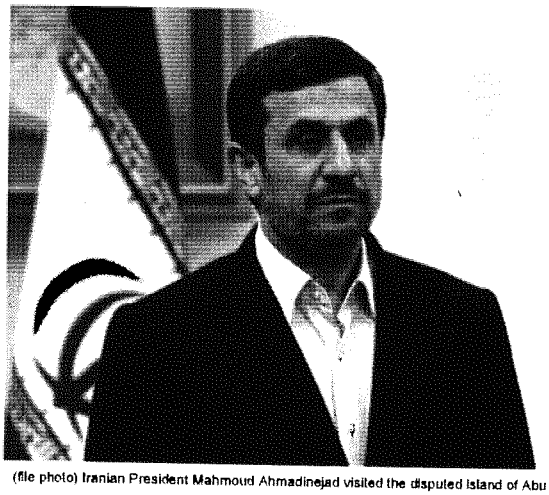
3.4 The evaluation procedures and criteria for introduction, delegation and operation of new TLDs should be developed and implemented with the participation of all stakeholders.

N.B. The public policy priorities for GAC members in relation to the introduction of Internationalised Domain Name TLDs (IDN TLDs) will be addressed separately by the GAC.

Annex 12

Ahmadinejad's visit to island prompts UAE to recall Iran ambassador

By the **CNN Wire Staff**
updated 10:42 AM EDT, Thu April 12, 2012



(file photo) Iranian President Mahmoud Ahmadinejad visited the disputed island of Abu Mousa in the Persian Gulf.

STORY HIGHLIGHTS

- Iranian President Mahmoud Ahmadinejad visited the disputed island of Abu Mousa
- UAE foreign minister described the visit as a "flagrant violation" of his country's sovereignty
- The UAE and Iran are involved in a long-running dispute over three Persian Gulf islands

Abu Dhabi (CNN) -- The UAE recalled its ambassador to Iran on Thursday in protest of a visit by Iranian President Mahmoud Ahmadinejad to a disputed island.

Abu Mousa is one of three Persian Gulf islands that are the subject of a longtime border dispute between the two countries.

The UAE's Foreign Ministry said it was summoning Tehran envoy Saif Mohammed Obaid Al Zaabi for consultations.

The move comes a day after Foreign Minister Abdullah bin Zayed condemned Ahmadinejad's visit to Abu Mousa "in the strongest possible terms," according to a report by state news agency WAM.

The UAE says Iran has illegally occupied Abu Mousa since 1971. The two other disputed islands are the Greater and Lesser Tunbs.

The foreign minister described the visit as a "flagrant violation" of UAE sovereignty and said it was a setback to efforts to find a peaceful resolution to the issue, WAM reported.

Ahmadinejad used his visit to Abu Mousa to comment on the historical basis for the Persian Gulf's name, according to Iranian state news agency IRNA. Arab states refer to the body of water as the Arabian Gulf.

Iran views the islands as part of its territory.

CNN's Elise Labott contributed to this report.

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ShammyLewis • 3 years ago
The nicest thing about the decline of fossil fuel's importance over the next century will be the Arab states returning to irrelevancy. A century ago they were savages on Camels. A century from now they will return. All those who got rich have already started fleeing to London.
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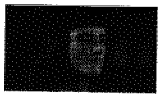
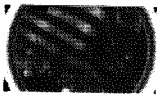


Former hostage 'shamed' by torture
updatnd 10:48 AM EST, Tue February 5, 2013

Robert Fowler spent 130 days held hostage by the same al Qaeda group that was behind the Algeria massacre. He shares his experience.

North Korea nuclear dream video
updated 12:07 AM EST, Wed February 6, 2013



As "We are the World" plays, a video shows what looks like a nuclear attack on the U.S. Jim Clancy reports on a bizarre video from North Korea.

Why U.S.-Russia relations have frozen

The relationship is, once again, cold enough to make Obama's much-trumpeted "reset" in Russian-U.S. relations seem thoroughly off the rails.

Iraq war: What was your experience?

Ten years on, what do you think the Iraq war has changed in you, and in your country? Send us your thoughts and experiences.

Daniela Mercury: Music is Brazil's soul
updated 7:15 AM EST, Tue February 5, 2013

Musician Daniela Mercury has sold more than 12 million albums worldwide over a career span of nearly 30 years.

Photos: Faces of the world

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updated 7:08 PM EST, Tue February 5, 2013

Europol claims 380 soccer matches, including top level ones, were fixed - as the scandal widens, CNN's Dan Rivers looks at how it's done.

Disney: Star Wars spinoffs there will be
updated 7:37 AM EST, Wed February 6, 2013

That galaxy far, far away is apparently bigger than first thought. The "Star Wars" franchise will get two spinoff movies, Disney announced.

15 biggest souvenir-buying no-no's
updated 7:27 PM EDT, Fri July 25, 2014

It's an essential part of any trip, an activity we all take part in. Yet almost none of us are any good at it. Souvenir buying is too often an obligatory slog.

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Annex 13

Is trouble brewing between the UAE and Iran?

As Gulf states unite to take on Iran over disputed Gulf islands, we ask what this means for an already vo region.

Inside Story Last Modified: 19 Apr 2012 09:28

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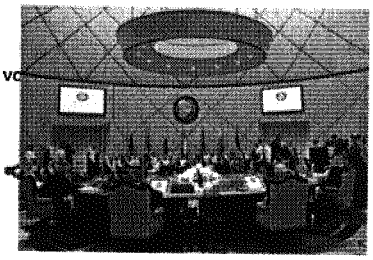

Gulf nations to meet over Iran island dispute

UAE summons Iranian ambassador over Ahmadinejad's visit to Abu Musa, with Gulf states set to discuss sovereignty row. (16-Apr-2012)

Who's responsible for US-Iran tensions?

Media roundup: An imminent strike on Iran?

Iran nuclear talks: A positive first step?

The Gulf Cooperation Council (GCC) held an emergency meeting on Tuesday in Doha where its members discussed the latest dispute between the United Arab Emirates (UAE) and Iran.

The two countries disagree over who has jurisdiction over three small but strategically important islands near the entrance to the Strait of Hormuz.

In 1971, Tehran seized control of Abu Musa, an island in the eastern Gulf, as well as the Greater and Lesser Tunbs, located 60km off the UAE's coast.

The GCC's meeting followed the recent visit of Mahmoud Ahmadinejad, the Iranian president, to Abu Musa - something the UAE called a provocation.

Now for the first time in more than 40 years, Abu Dhabi is demanding international arbitration over the status of the three disputed islands and the GCC agrees.

Ali Akbar Salehi, Iran's foreign minister, responded with a statement in which he said: "Our rule over the islands is not negotiable, and Iran's sovereignty over the islands is certain and on the record .... We hope that the other sides act with patience, perseverance, insight and prudence regarding the misunderstandings that could arise, or else issues will become very complicated."

"The hardliners in the Iranian government took this issue and they want to escalate the situation and manufacture a major crisis in the Gulf region to divert attention from the crisis in Syria or the crisis over the Iranian nuclear file or the crisis over the struggle within the Iranian leadership."

- Mustafa al-Ani, the director of the security and defence unit at the Gulf Research Centre

Ahmadinejad gave a fiery speech in Tehran on Tuesday, in which he said potential aggressors would regret any attack on the country.

The dispute over Abu Musa and the other islands is just the latest example of the growing tensions between GCC countries and Iran.

Members of the GCC played an important role in firming up international support for US-led sanctions against Iran. They did that by reassuring countries like China that they would increase oil production. In January, the UAE announced it was building an oil pipeline that would bypass the strategic Strait of Hormuz, which Iran has repeatedly threatened to block.

The GCC has also argued with Iran over Syria. As Syria's most important ally, Iran has denounced Qatar and Saudi Arabia for interfering in Syria's internal affairs.

"Ahmadinejad was not trying to demonstrate a point viz a viz the Gulf state leaders. He was just visiting Abu Musa .... It seems the accession of Abu Musa island to Iran officially in 1971 by [the] British is seen as an ... illegal seizure by the Gulf leaders."

- Sadegh Zibakalam, a professor of political science at Tehran University

Nouri al-Maliki, Iraq's prime minister, is also deemed to be too close to Iran, which is a concern for the Gulf states. In March, the first Arab League summit held in Baghdad in two decades was attended by mostly low-level officials from the Gulf.

And finally, last month Saudi Arabia hosted the first GCC-US strategic forum, at which Hillary Clinton, the US secretary of state, voiced her commitment to defend GCC states against external threats, particularly Iran.

So, will the dispute between GCC countries and Iran over the islands escalate? Just why do the islands matter and what does the exchange of angry words mean for the already volatile region?

Inside Story discusses with guests: Mustafa al-Ani, the director of the security and defence unit at the Gulf Research Centre; Sadegh Zibakalam, a professor of political science at Tehran University; and Fahad al-Shalemi, a former colonel in the Kuwaiti army and president of the Gulf Peace and Security forum.

"Everyone knows and should know that the dear nation of Iran is the most peace-loving nation in the world. But everyone should also know that if there is any aggression against the Iranian nation, or our proud military, or if the land, interests and dignity of Iran are looked at in a hostile manner, the enemies will be confronted with a deep and embarrassing sense of regret."

Mahmoud Ahmadinejad, the Iranian president

FACTS: THE UAE-IRAN ISLAND DISPUTE

- Iranian leader's visit to Abu Musa reignited longstanding dispute
- The UAE wants arbitration to decide control of the islands, but Iran refuses
- GCC leaders met in Doha to discuss the dispute over the strategic Gulf
- GCC called on Iran to end its "occupation" of Abu Musa
- The UAE withdrew its ambassador to Tehran after Ahmadinejad's visit
- Tehran says the islands are an inseparable part of Iran
- The UAE and Iran had previously agreed to deal with the situation amicably
- Iran took control of the three islands near the Strait of Hormuz in 1971
- Iran has built an airport and a desalination plant on the islands
- Iran has barred UAE nationals from visiting the three Gulf islands

Source: Al Jazeera

TOPICS IN THIS ARTICLE

People	Country	City	Organisation
Mahmoud Ahmadinejad	Islamic Republic of Iran	Tehran	Gulf Cooperation Council
Ali Akbar Salehi	UAE	Doha	Gulf Research Centre
Hillary Clinton	United States	Baghdad	Gulf council
Sadegh Zibakalam	Syria	Abu Dhabi	Arab League
Mustafa Al Ani	Saudi Arabia		Tehran University
Fahad al Shalemi	Qatar		Kuwaiti army
Nouri al Maliki	China		
	Iraq		

United Arab Emirates

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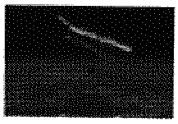
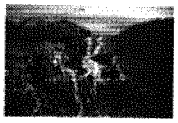
Rising tide of UK anti-immigrant sentiment

Swathes of the British electorate continue to show discontent with all things European, including immigration.



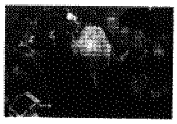
A glimpse into the universe's oldest galaxies

Astronomers have captured images of primordial galaxies that helped light up the cosmos after the Big Bang.



The photo controversy over indigenous people

Critics assail British photographer's portrayal of indigenous people, but he says he's highlighting their plight.



'We got this, Bob Geldof, so back off'

As Western stars re-release 1980s charity hit, many Africans say it's a demeaning relic that can do more harm than good.

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Liberal programmes such as social security and marijuana production will be tested at Sunday's election.

Iraq war resisters fight to stay in Canada

Marked for deportation, as many as two dozen military deserters will likely face stiff penalties upon return to US.

South Sudan's displaced

At least 25,000 displaced people have gathered on the northern border, with more on the way trying to escape attacks.

Australia sharks

Great white activity off famous Bondi Beach had beach-goers scrambling out of the water, but experts say don't panic.

Ukraine protests

Remnants of deadly demonstrations to be displayed in a new museum, a year after protests pushed president out of power.

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Annex 14

Arab League calls for Iran to resolve islands dispute with UAE

The National staff

March 10, 2014 *Updated: March 10, 2014 07:40 PM*

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Rouhani travels to Oman in first official visit to Arab state

Union of Arab writers backs UAE claim to occupied islands

US issues statement supporting UAE in islands row with Iran

UAE summons Iranian ambassador over Abu Musa island dispute

UN Arab Group backs UAE over Abu Musa island

Topics:Iran

The Arab League Ministerial Council has stressed the UAE's "absolute sovereignty" to three islands occupied by Iran and called for a resolution to the dispute.

At the end of the Arab League's 141st session, the council criticised Iran's occupation of Abu Musa and the Greater and Lesser Tunbs, saying it breached the UAE's sovereignty.

It said the situation was destabilising security and stability in the region and the world, the state news agency Wam reported.

The council denounced the Iranian government building homes on the three islands, and holding military manoeuvres on them and in regional waters and airspace.

"Such moves will not help build confidence, but threaten the security and stability of the region, and expose regional and international navigation in the Arabian Gulf to danger," it said.

The council also condemned Iran for opening two offices on Abu Musa and called for it to remove them.

It praised the UAE's efforts towards finding a peaceful solution to the disputes.

The league called on the UN secretary general and president of the Security Council to keep the issue on the agenda.

It urged the Arab League secretary general to follow the issue and give an update to the council in its next ordinary session.

Iran took over the three islands on the eve of the UAE's Federation in 1971.

newsdesk@thenational.ae

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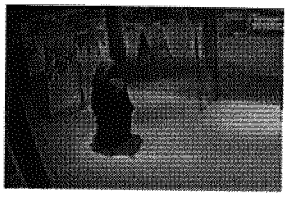

Suspect who stabbed woman to death on Reem Island still at large: Abu Dhabi Police

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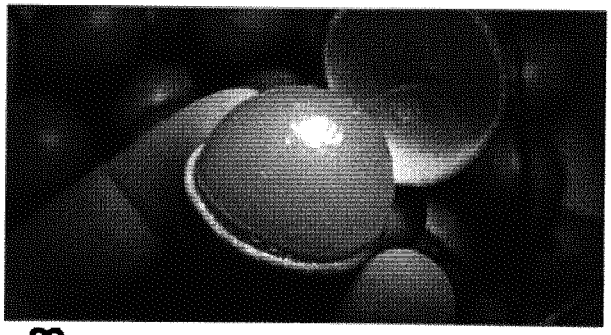

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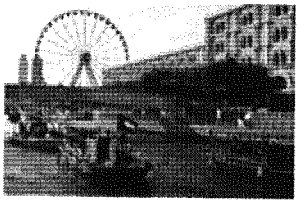

Fujairah gives the big day a taste of something different

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Annex 15

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Iran threatens airline ban over "Arabian Gulf" tag

Mon, Feb 22 2010

TEHRAN (Reuters) - Iran has threatened to ban airlines from using its airspace if they refer to the waterway between Iran and Arab states as the "Arabian" instead of "Persian" Gulf.

The unusual move reflects tension in the region over Iran's dispute with the United States and its allies over its nuclear enrichment activities and the position of Arabian Peninsula states caught between ties to Washington and fear of Tehran.

Gulf Arab states share U.S. anxiety that Iran seeks to develop a nuclear weapons capability. Most of them offer facilities to U.S. military forces and some have heavily purchased U.S. weaponry in recent years.

"The airlines of the southern Persian Gulf countries flying to Iran are warned to use the term Persian Gulf on their electronic display boards," Road and Transport Minister Hamid Behbahani said in comments in the daily Iran newspaper.

"Otherwise they will be banned from Iranian airspace for a month the first time and upon repetition their aircraft will be grounded in Iran and flight permits to Iran will be revoked," he added.

The warning seemed directed at airlines based in the Gulf Arab countries and flying into Iran, but the newspaper report also said Iran had taken action against a foreign employee of one of its own airlines.

A Greek employee of Iranian commercial carrier Kish Air had been fired for using the term "Arabian Gulf" on a display board, and the airline had been asked to apologize over the incident.

The Saudi-based Islamic Solidarity Sports Federation said last month it had scrapped the Islamic Solidarity Games which were to be held in Iran in April because of a dispute over whether the Gulf waterway is "Arab" or "Persian".

Designation of the key waterway for global oil and gas supplies has long been a touchy issue among the countries bordering it -- Saudi Arabia, Kuwait, Qatar, Bahrain, the United Arab Emirates, Oman, Iraq and Iran.

Iran says it is the Persian Gulf, the Arab states say it is Arab. Foreign language descriptions can offend either party if they use one name or the other, or sometimes if they avoid an adjective altogether.

The dispute over Iran's nuclear energy program, which Tehran says is aimed solely at generating electricity, is part of a wider concern among Sunni Muslim-led Arab governments over Iranian expansionism in the Middle East.

Iran has a network of allies including Shi'ite groups in power in Iraq, the Syrian government, Lebanon's Hezbollah and the Palestinian Islamist group Hamas that rules Gaza.

(Reporting by Hashem Kalantari, writing by Andrew Hammond; Editing by Charles Dick)

Annex 16

undefined

THE WORLD

Iran's Anger Over a New Map Magnifies a Perception Gulf

Tehran bans National Geographic after a secondary label for the Persian Gulf is interpreted as an attack.

December 02, 2004 | Megan K. Stack | Times Staff Writer

TEHRAN — They were just two small words, a parenthetical aside on a National Geographic map.

But that's all it took to get fiercely proud Iranians to rise up this week against what they saw as an attack on their history.

In its latest world atlas, National Geographic added "Arabian Gulf" in parentheses beneath "Persian Gulf" to label the body of water that cuts along the coasts of Iran and its Arab neighbors.

The use of Arabian Gulf, and the implication that Iran may somehow be losing its historical claims to dominance of the ancient seas, pierced the cultural pride that pervades the land once known as Persia. It gave fresh life to the long and often bloody tensions between Iranians and Arabs, and added fuel to a widely held Iranian suspicion that Arabs have been quietly lobbying for years to change the name of the Gulf.

The Islamic Republic swiftly banned the National Geographic Society from selling its publications here or sending journalists into the country.

"Under the influence of the U.S. Zionist lobby and the oil dollars of certain Arab governments, the society has distorted an undeniable historical reality," wrote Hassan Hanizadeh in Tehran Times, a leading daily newspaper. "The society owes the Iranian nation an apology for distorting historical realities and using the unacceptable 'Arab Gulf' instead of the beautiful and historical name of the Persian Gulf."

So keen was the perceived slight that it brought a fleeting unity to Iran's far-flung political spectrum. From the left to the right to the disaffected, Iranians rallied against the offending American magazine. They blamed the "Zionists," accused the Arabs and lambasted the Americans.

"Distortion," "Discreditable," and "Politically Motivated," cried the headlines.

"The Arabs think that because they're rich they can buy anything, even names," said Mahbubeh Tabatabei, a 30-year-old woman who wandered in a sleepy shopping center in Tehran, window shopping with her mother and sister. "Even the way they walk, they think they own everything."

Al Jazeera, the Arab satellite television channel whose headquarters are in Qatar, on the other side of the Gulf from Iran, played an animated cartoon to poke fun of Iranian ire. In it, an Iranian mullah is oblivious to regional strife but furious over the name of the Gulf.

Iran responded by threatening to restrict Al Jazeera's work along with the National Geographic ban.

"I was shocked and disappointed to see such a prestigious network acting so unprofessionally and falling into a Zionist trap," said Abdollah Nasseri, an official with the Islamic Republic News Agency.

"There is no doubt that it is a Zionist conspiracy to sow discord among the Muslims, and it is unfortunate that some fallen Arab capitalists have also fallen into the same trap."

FROM THE ARCHIVES

Two Lessons in One
December 8, 2004

Another Perspective on Persian Gulf Map Flap
December 4, 2004

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Even some computer techies sympathetic to Iran were stirred to action, and pulled off a "Google bomb," successfully manipulating the search engine to obtain a high ranking. When computer users type "Arabian Gulf" in the Google search field, the first link is to the arabian-gulf.info website, which says, "The Gulf you are looking for does not exist. Try Persian Gulf."

Tehran's Shahr Cultural Center hastily announced a contest called "Persian Gulf Forever," and requested paintings and slogans inspired by Iran and the Persian Gulf "in response to the use of unacceptable alternative names."

"The competition is being organized as a protest and to inform the National Geographic Society of the Iranian nation's dissatisfaction with the move," an article in Tehran Times said.

The Minister of Culture and Islamic Guidance urged Iranian filmmakers to bolster their homeland's image by learning about their heritage and producing films showcasing Iranian history.

"We need to seriously defend our Iranian identity," said Ahmad Masjed-Jamei , according to Iranian news reports. "We should not allow the faking of history as well as names for Iranian areas."

Iran also was miffed -- though considerably less so -- because the atlas also referred to the disputed islands of Abu Musa and Greater and Lesser Tunb, claimed by the United Arab Emirates, as being "occupied by Iran."

National Geographic has remained unapologetic. The publication recognizes "Persian Gulf" as the primary name, but "we want people searching for 'Arabian Gulf' to be able to find what they're looking for and not confuse it with the nearby Arabian Sea," said a statement by Allen Carroll, chief cartographer, on the National Geographic website.

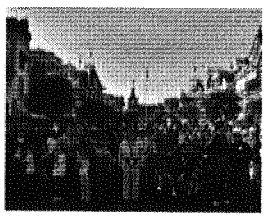
Iranians may have felt isolated during the 25 years since the Islamic revolution, but they are also raised on proud tales of a glorious past when Persia was a superpower and one of the world's great civilizations.

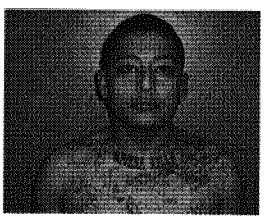
The Persian Gulf figures prominently in that collective memory.

"Before Islam, all these countries belonged to the Persian empire," said Sayed Mustafa Taj-Zadeh, an advisor to Iranian President Mohammad Khatami. "Therefore, when the Persian Gulf is changed to another name, it doesn't matter what ideology you belong to, it's insulting."

In the early, idealistic days of the Islamic revolution, he recalled, the young revolutionaries considered changing the name to "Islamic Gulf" in a bid to forge friendships with their Arab neighbors. But the idea was discarded.

"Our pride has kept us going for thousands of years," he said. "For Iranians, prestige is very important."





Johnny Cash's dark California days

After dark, the dirty work at Disneyland begins

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Annex 17

BBC NEWS

Gulf dispute halts Islamic games

The Islamic Solidarity Games, due to be held in Iran in April, have been called off because of a dispute with Arab countries over what to call the Gulf.

The games federation in Saudi Arabia said the Iranian organisers had failed to address its concerns, particularly about the planned logo and medals.

These bear the words "Persian Gulf", but Arab countries, who call it the Arabian Gulf, reject the term.

The games had been postponed in October in the hope of striking a deal.

The Islamic Solidarity Sports Federation (ISSF) in Riyadh said, after an emergency board meeting, Iran's local organising committee "unilaterally took some decisions without asking the federation by writing some slogans on the medals and pamphlets of the games".

Iran "did not abide by the rules of the Islamic Solidarity Sports Federation" and "did not follow the decisions taken by the general assembly of the federation at a previous meeting in Riyadh", it said in a statement.

But Iran's committee for the games disputed the decision.

"In spite of convincing arguments made to the ISSF executive committee, regrettably and without presenting any logical reasons, the ISSF committee decided not to hold the games with Iran as the host," it said.

The games - which are meant to strengthen ties among Islamic countries - were first held in the Saudi city of Jeddah in 2005.

Iran has campaigned to ensure the body of water between Iran and the Arabian peninsula is known as the Persian, not the Arabian, Gulf.

Story from BBC NEWS:
http://news.bbc.co.uk/go/pr/fr/-/2/hi/middle_east/8465235.stm

Published: 2010/01/18 11:52:51 GMT

Annex 18

Iran bans The Economist for publishing map depicting 'the Gulf,' instead of Persian Gulf

Updated 6/14/2006 6:59 PM ET

TEHRAN (AP) — Iran has banned *The Economist* magazine for describing the Persian Gulf as merely "the Gulf" in a map published in the latest edition, state television reported Wednesday.

It is the second time in two years that Iran has banned such an international publication for failing to use the term "Persian Gulf" in a map. In 2004, it banned the *National Geographic* atlas when a new edition appeared with the term "Arabian Gulf" in parentheses beside the more commonly used Persian Gulf.

Tehran believes in aggressively defending the use of the historical term Persian Gulf. It regards the name Arabian Gulf, used by some, as a name dreamed up by Arab nationalists.

While Iran dominates the eastern side of the waterway, the western shores are held by Saudi Arabia, the United Arab Emirates and other countries.

State television reported late Wednesday that the Ministry of Culture and Islamic Guidance had banned the importation and distribution of current and future editions of *The Economist*. The ban would only be lifted when the journal used "Persian Gulf," the ministry was quoted as saying.

In London, where *The Economist* is published, the magazine said it would stand its ground.

"We've used 'the Gulf' for a long time, and we have no intention of changing it at the moment," a spokeswoman for *The Economist* said, speaking on condition of anonymity in keeping with the magazine's policy.

She said the magazine sells about 750 English-language copies in Iran per week.

The current week's issue runs an article on the Iranian nuclear dispute titled: "Iran and nuclear diplomacy: Risky Bargaining — Should Iran's latest threat to stop oil exports be taken seriously?" The offending map shows Iran and its neighbors, with the waterway designated "the Gulf."

Iran lifted its earlier ban on the *National Geographic* atlas after the publishers decided the following month to drop the term "Arabian Gulf" in favor of a note, printed in the middle of the Gulf, that said while most people call it the Persian Gulf, "this body of water is referred to by some as the Arabian Gulf."

Posted 6/14/2006 6:12 PM ET

Updated 6/14/2006 6:59 PM ET

Annex 19

December 03 2014 | Last updated 1 hour 57 minutes ago

gulfnews.com

Gulf | Bahrain

GCC to protest 'Persian Gulf' name by Fifa

Name change by football body open old wounds in bitter dispute

By Habib Toumi, Bureau Chief
Published: 15:18 September 24, 2013

GULF NEWS

Manama: The Gulf Cooperation Council (GCC) is planning to submit a formal protest to the international football federation (Fifa) after the governing body of world football replaced the name of the Arabian Gulf on its official website with "Persian Gulf".

"The six GCC member countries — Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the UAE will seek a rectification of the name," sources told Saudi daily *Okaz*. "The GCC countries have contacted members of the Asian Football Federation executive bureau to assess the situation that they see as a nonsensical move by Fifa," the sources said.

The UAE football head will send a protest note to Fifa for changing the name on its website and in its official correspondence, the sources added.

"There have been contacts with Saudi Arabia and other GCC football federations in order to coordinate our positions and adopt a strong stance," Yousuf Al Serkal, the president of the UAE football federation, said. "We need to see matters back the way they were before this change. Politics should not be involved in sports. We do not wish to see matters off track because we are involved in sports and serve our young people as they fulfil their aspirations," he said, quoted by *Okaz*.

According to the daily, Fifa did not alert any of the six GCC federations about its intention to change the name and the move was felt as a shock.

"The Saudi federation will address the international football body to explain these errors," Al Zahrani, the supervisor of the Saudi federation website, said. "The federation will take the appropriate action following the clarifications by Fifa. There will be official measures in case this attitude that targets our Gulf identity is not rectified," he said, quoted by *Okaz* on Tuesday.

Related Links
The GCC and Iran: What kind of a deal?
Arab-Iran ties are a work in progress
GCC looks for better relations with Iran

The misnaming should be rectified promptly so that it is used in continental and international competitions, he added.

Iran and the GCC countries have often been at odds over the name of the waterway that separates them.

Tehran has vehemently insisted on calling it the "Persian Gulf" and has taken action against publications referring to it by the correct name.

The Arabian Gulf lies to the east of Arab countries and west of Iran.

The Gulf has an area of 233,100 square kilometres and extends 970 kilometres from the Shatt Al Arab delta to the Strait of Hormuz, which links it with the Sea of Oman.

In 2009, the Saudi-based Islamic Solidarity Games Federation cancelled the Islamic Solidarity Games planned to be held in Tehran after Iran put 'Persian Gulf' on the logo.

The Islamic Solidarity Games, meant to strengthen unity among the 57 member states, were originally scheduled for October 2009, but were postponed in an attempt to reach a compromise.

In May 2010, Iran shut down Egypt's stall at Tehran's international book fair for selling a book using the Arabian Gulf name.

"Police on patrol disguised as visitors stumbled upon a book entitled 'Arabian Gulf Encyclopedia', offered in the Egyptian pavilion at the Tehran International Book Fair," Tehran Police Chief Hossein Sajedinia said, quoted by the Iranian Students News Agency (ISNA).
"Consequently, the pavilion was shut down and police forces recovered the distributed copies of the book with the help of the book fair officials and judicial authorities," he said.

Iranian media claimed that the book "promoted the false, misleading and recently-concocted name of Arabian Gulf," and that the "correct, research-verified and historically documented name for the body of water is the Persian Gulf."

In August 2010, the mayor of Shiraz in southwestern Iran called for action against Bahrain's national carrier Gulf Air for not using the "Persian" Gulf name.

Hossein Qasimi said that Iranian passengers who board Gulf Air planes in Shiraz were upset that the airline did not refer to the Gulf as "Persian Gulf".

Annex 20

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The Circle of Ancient Iranian Studies

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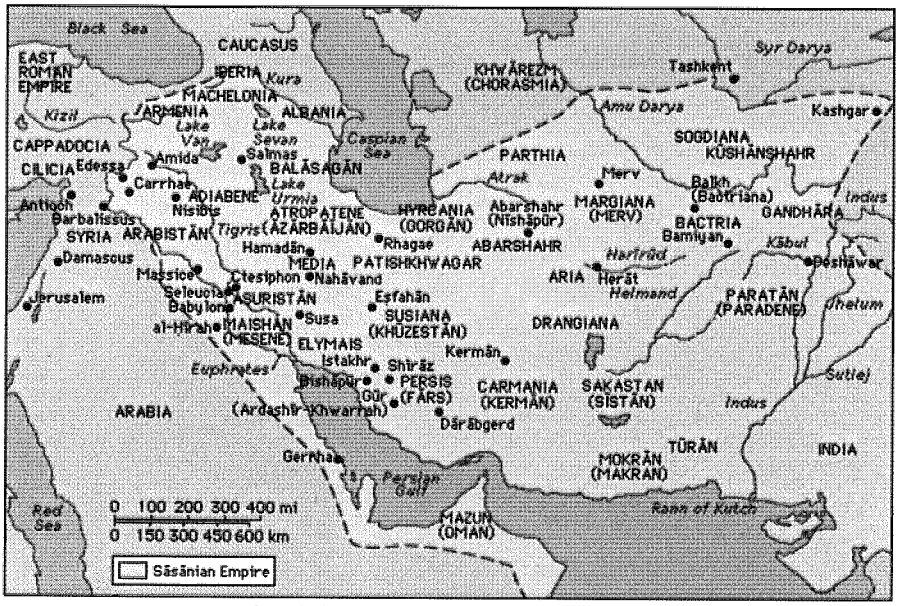
Thematic Essay
Persian Gulf Name Disputing



Iran Prior to Arab Invasion in 7th c. CE

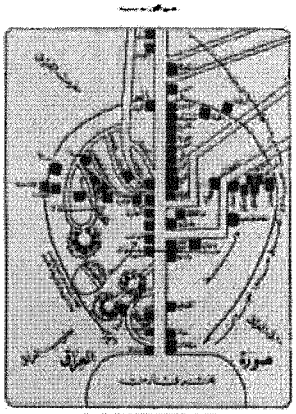
Introduction

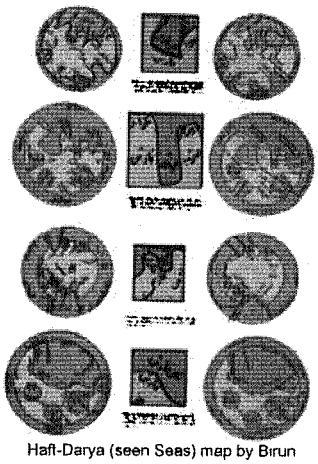
The name of the body of water separating the Iranian plateau and the Arabian Peninsula has been disputed by some Arab countries since the 1960s. This body of water is historically and most commonly called the Persian Gulf, after the land of Persia (Iran). Rivalry between Persians and Arabs, however, along with the emergence of pan-Arabism and Arab nationalism in 1960s, has seen the name Arabian Gulf become predominant in some Arab countries.[1] Names beyond these two have also been applied to or proposed for this body of water.

Overview

On almost all maps printed before 1960, and in most modern international treaties, documents and maps, this body of water is known by the name "Persian Gulf", reflecting traditional usage since the Greek geographers Strabo and Ptolemy, and the geopolitical realities of the time with a powerful Persian Empire (Iran) comprising the whole northern coastline and a scattering of local emirates on the Arabian coast. But by the 1960s and with the rise of Arab nationalism, some Arab countries, including the ones bordering the Persian Gulf, adopted widespread use of the term al-Khalīj al-'Arabī (Arab Gulf or Arabian Gulf) to refer to this waterway. This coupled the decreasing influence of Iran after 1979 revolution in Iran on the political and economic priorities of the English speaking Western World led to increasing acceptance, in regional politics and the mostly petroleum-related business, of the new alternative naming convention "Arabian Gulf".

Until the end of the 19th century, "Arabian Gulf" was used to refer to what is now known as the Red Sea. This usage was adopted into European maps from, among others, Strabo and Ptolemy, who


An Islamic map showing Persian Gulf, dated 320 A.H.


Haft-Darya (seen Seas) map by Birun

"History is the Light on the Path to Future"

Encyclopaedia Iranica

The British Institute of Persian Studies

"Persepolis Reconstructed"
Persepolis3D

The British Museum

The Royal Asiatic Society

The Persian Gulf Facebook Page

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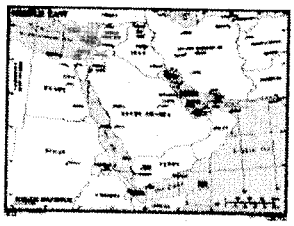
called the Red Sea *Sinus Arabicus* (Arabian Gulf). Both of these Greek geographers used the name "Persian Gulf" to refer to the body of water between the Arabian Peninsula and Iran.

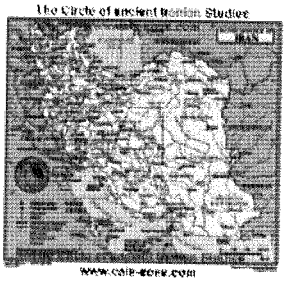
In the early Islamic era, Muslim geographers did the same, calling the body *Baḥr Fāris* (Persian Sea) or *Khalīj Fāris* (Persian Gulf). Later, most European maps from the early Modern Times onwards used similar terms (*Sinus Persicus, Persischer Golf, Golfo di Persia* and the like, in different languages) when referring to the Persian Gulf, possibly taking the name from the Islamic sources. For a short while in the 17th century, the term "Gulf of Basra" was also being used, which made a reference to the town of Basra (Iraq), an important trading port of the time. Basra, however, is not on the shore of the waterway. The Times Journal, published in London in 1840, referred to the Persian Gulf as the "Britain Sea," despite the distant geography.[2]

Currently, the Google Earth application has included the term "Arabian Gulf" on maps where the body of water, historically and contemporarily known as the "Persian Gulf," is located. A similar mistake was made in 2004 by the National Geographic Society. As a direct results of efforts by the National Iranian American Council, in 2005 the National Geographic Society corrected their 8th Edition maps.

UN Maps



United Nations map of the Middle East



United Nations Map of Iran
Courtesy of the United Nations
(Click to enlarge)

In February 2008, The National Iranian American Council's Board of Directors sent a letter to Google's CEO, Dr. Eric E. Schmidt, about the politically divisive consequences of including the term "Arabian Gulf" as a name for the body of water extending from Iran to the Arabian Peninsula.

Proposed alternative names

The matter remains very contentious as the competing naming conventions are supported by certain governments in internal literature, but also in dealings with other states and international organizations. Some parties use terms like "The Gulf" or the "Arabo-Persian Gulf". After the Iranian Revolution of 1979 some people in Islamic groups suggested the use of "Islamic Gulf." The originator of the term Islamic Gulf is not known, while some people suggest that prominent figures of the early years of the Islamic republic including Ruhollah Khomeini, Mehdi Bazargan, and Sadegh Khalkhali may have supported the idea. The idea was quickly abandoned after Iran was invaded by its predominantly Muslim neighbor, Iraq. Possibly the most famous person who has used the term "Islamic Gulf" recently has been Osama bin Laden, who used the term as late as 1996

Viewpoint of Iran

Iran does not recognize the naming when it is referred to as just "Gulf", or "Arabian Gulf."[3]

Viewpoint of Arab states

Most Arab countries, including members of the GCC, endorse the name "Arabian Gulf" and some including the UAE have even banned the use of the term "Persian Gulf" across their country. In the UAE this ban applies to textbooks, publications and newspapers among others.

Viewpoints of third parties

The United Nations

The United Nations on many occasions has requested its secretarial staff to use only "Persian Gulf" as the standard geographical designation for that body of water. Most recently, the UN Secretariat has issued two editorial directives in 1994 and 1999 affirming the position of that organization on the matter. [10][11]

The group of experts on Geographical Names was set up by the secretary-general of the United Nations in pursuance of economic and Social council resolution 715A(XXVII) on April 23, 1959 and has endorsed 'Persian Gulf' as the official name for this body of water.[3]

The United Nations Group of Experts on Geographical Names was set up by the secretary-general of the United Nations in pursuance of economic and Social council resolution 715A(XXVII) on April 23, 1959. The group discussed the naming issue during its 23rd session, held in Vienna from March 28th to April 4th, 2006. According to the report of the meeting, the Convenor "noted that countries could not be prohibited from using or creating exonyms."[4]

The use of the name 'Arabian Gulf' was described to be 'faulty' by the Eighth United Nations Conference on the Standardization of Geographical Names, Berlin, 27 August September 2002.[5]

The United States
In the United States, Persian Gulf has been the label sanctioned for U.S. government use [12] since a decision by the State Department's Board of Geographical Names in 1917[6]: As recognized by the United States Board on Geographic names, the name of the body of water that lies between Iran and the Arab states of the Gulf Cooperation Council is the Persian Gulf. For political reasons, Arabs often refer to it as the Arab or Arabian Gulf. The NGA GEOnet Names Server (GNS), maintained by the National Geospatial-Intelligence Agency, is the "official repository of standard spellings of all foreign place names" sanctioned by the Board of Geographical Names. [13] The GNS lists "Persian Gulf" as the only "conventional" name, along with fourteen unofficial "variants" in different languages, such as "Gulf of Iran", "Gulf of Ajam", "Gulf of Basra", "Arabian Gulf", "Persian-Arabian Gulf", "Gulf of Fars", and "Farsi Gulf".[14]

In recent years, due to increased cooperation with Arab states of the Persian Gulf, various branches of the U.S. armed forces have issued directives to their members to use the "Arabian Gulf" when operating in the area ("Persian Gulf" is still used in official publications and websites), partially to follow local conventions, or simply to follow local laws that ban the use of "Persian Gulf", e.g. in the United Arab Emirates. Also for similar reasons, branches of American universities in the region have also dropped references to "Persian Gulf" in their teaching materials.[citation needed]

All multinational naval forces (including Australia, the US and UK) refer to the area as 'Arabian Gulf' during operations, and their naval charts reflect this. The area is nominally divided into three areas: Northern Arabian Gulf (NAG, with principal focus around the Kwahr Al Amaya and Al Basra Oil Terminals), Central Arabian Gulf (CAG, around Saudi Arabia and Bahrain) and Southern Arabian Gulf (SAG, around Abu Dhabi and Dubai).[15]

United Kingdom
The United Kingdom government's Permanent Committee on Geographical Names for Official British Use (PCGN) endorses 'The Persian Gulf' as the correct name for this body of water [16].

Atlases and other media
In 2004, the National Geographic Society published a new edition of its National Geographic Atlas of the World using the term "Arabian Gulf" as an alternative name (in smaller type and in parentheses) for "Persian Gulf". This resulted in heavy protests by many Persians, especially the Internet user community, which led to the Iranian government acting on the issue and banning the distribution of the society's publications in Iran. On December 30, 2004, the society reversed its decision and published an Atlas Update, removing the parenthetical reference and adding a note: "Historically and most commonly known as the Persian Gulf, this body of water is referred to by some as the Arabian Gulf." It also removed the alternative Arabic names for certain islands and/or replaced them with Persian ones [17]

The 2000 Associated Press manual on usage elaborates: Persian Gulf is the "long-established name" and the best choice. "Some Arab nations call it the Arabian Gulf. Use Arabian Gulf only in direct quotations and explain in the text that the body of water is more commonly known as the Persian Gulf."

Some atlases and media outlets have taken to referring to "The Gulf" without any adjectival qualification. This usage is followed by The Times Atlas of the World.

Iran does not consider this an impartial usage and views it as an active contribution to abandonment of the historical name. In June 15, 2006 Iran banned the sale of The Economist for the above reason. A major map in an issue labeled the Persian Gulf as 'The Gulf'. As of the December 22, 2007 issue the magazine has continued to use "The Gulf".

---

[1] Abedin, M., 'All at sea over 'the Gulf', *Asia Time Online*, December 09, 2004. http://www.atimes.com/atimes/Middle_East/FL09Ak03.html.
[2] For more information, see the United Nations paper: "Historical, Geographical and Legal Validity of the name 'Persian Gulf'" (April 2006).

Annex 21

الرقم : 5/1602

التاريخ : 13 MAR 2013

الأمانة العامة

Dr. Stephen Crocker
Chairman of the Board of Director
Internet Corporation for Assigned Names and Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536, USA

Phone: +1 310 301 5800
FAX: +1 310 823 8649

Heather Dryden
Chair, Governmental Advisory Committee

Subject: New gTLD Application "*.persiangulf*" by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

Dear Dr. Crocker and Ms. Heather,

I am writing to you within my capacity as the undersecretary general for economic affairs at the League of Arab States, being responsible for the Information and Telecommunications Development within the Arab region, and with regard to the process of new gTLDs recently launched by your esteemed organization.

It has come to my knowledge that an application file was submitted by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti., for the new gTLD "*.persiangulf*". In this regard, I would like to express my concern as the string refers to the body of water separating the Arabian peninsula and the Iranian plateau with disputed name that is commonly referred to within the League of Arab States as the Arabian Gulf.

The name of the gulf has been controversial and debatable subject in various national, regional and international venues and levels. Besides, to the best of

Contact Information Redacted

my knowledge, the applicant did not consult or receive any endorsement from the community relevant to the intended geographical area.

The General Secretariat for League of Arab States would like to assure its support and endorsement for any objection presented by any Arab Gulf country with respect to the mentioned gTLD application file.

Finally, I would like to express my gratitude for your personal attention regarding this important matter.

Best Regards,

GENERAL SECRETARIAT OF ARAB LEAGUE

Mohammed At-Twaijri, Ph.D
Assistant Secretary General for Economic Affairs,

Annex 22

New gTLD Application Submitted to ICANN by: Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

Application Downloaded On: 15 Feb 2014

String: persiangulf

Application ID: 1-2128-55439

Applicant Information

1. Full legal name
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.

2. Address of the principal place of business
Contact Information Redacted

3. Phone number
Contact Information Redacted

4. Fax number
Contact Information Redacted

5. If applicable, website or URL
http://www.agitsys.com

Primary Contact

6(a). Name
Mehdi Abbasnia

6(b). Title
Managing Director

6(c). Address

6(d). Phone Number
Contact Information Redacted

6(e). Fax Number
Contact Information Redacted

6(f). Email Address
Contact Information Redacted

Secondary Contact

7(a). Name
Hakan Atalay

7(b). Title
The Head of Engineering Dept.

7(c). Address

7(d). Phone Number
Contact Information Redacted

7(e). Fax Number
Contact Information Redacted

7(f). Email Address

Contact Information Redacted

Proof of Legal Establishment

8(a). Legal form of the Applicant
Limited Company

8(b). State the specific national or other jurisdiction that defines the type of entity identified in 8(a).
Trade Registration Office (Ticaret Sicili Memurlugundan)

8(c). Attach evidence of the applicant's establishment.
Attachments are not displayed on this form.

9(a). If applying company is publicly traded, provide the exchange and symbol.

9(b). If the applying entity is a subsidiary, provide the parent company.

9(c). If the applying entity is a joint venture, list all joint venture partners.

Applicant Background

11(a). Name(s) and position(s) of all directors

Name	Position
Ali Zarinbakhsh	Member Of the Board
Mehdi Abbasnia	Managing Director

11(b). Name(s) and position(s) of all officers and partners

Name	Position
Fatih Atasoy	CFO
Mehdi Abbasnia	Managing Director

11(c). Name(s) and position(s) of all shareholders holding at least 15% of shares

Name	Position
Ali Zarinbakhsh	Member Of the Board
Mehdi Abbasnia	Managing Director

11(d). For an applying entity that does not have directors, officers, partners, or shareholders: Name(s) and position(s) of all individuals having legal or executive responsibility

Applied-for gTLD string

13. Provide the applied-for gTLD string. If an IDN, provide the U-label.
persiangulf

14A. If applying for an IDN, provide the A-label (beginning with "xn--").

14B. If an IDN, provide the meaning, or restatement of the string in English, that is, a description of the literal meaning of the string in the opinion of the applicant.

14C1. If an IDN, provide the language of the label (in English).

14C2. If an IDN, provide the language of the label (as referenced by ISO-639-1).

14D1. If an IDN, provide the script of the label (in English).

14D2. If an IDN, provide the script of the label (as referenced by ISO 15924).

14E. If an IDN, list all code points contained in the U-label according to Unicode form.

15A. If an IDN, upload IDN tables for the proposed registry. An IDN table must include:

1. the applied-for gTLD string relevant to the tables,
2. the script or language designator (as defined in BCP 47),
3. table version number,
4. effective date (DD Month YYYY), and
5. contact name, email address, and phone number.

Submission of IDN tables in a standards-based format is encouraged.

15B. Describe the process used for development of the IDN tables submitted, including consultations and sources used.

15C. List any variants to the applied-for gTLD string according to the relevant IDN tables.

16. Describe the applicant's efforts to ensure that there are no known operational or rendering problems concerning the applied-for gTLD string. If such issues are known, describe steps that will be taken to mitigate these issues in software and other applications.

The team behind Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has been involved in the development of various IDN scripts for over ten years. Through this work, we have become aware of some issues that may cause rendering problems for certain new gTLDs. We have reviewed the string that will be used with this application and based upon our expertise, we see no issues with operational or rendering problems concerning the applied for gTLD string.

17. OPTIONAL.
Provide a representation of the label according to the International Phonetic Alphabet (http://www.langsci.ucl.ac.uk/ipa/).

18A. Describe the mission/purpose of your proposed gTLD.

There are in excess of a hundred million of Persians worldwide. They are a disparate group, yet they are united through their core beliefs. They are a group whose origins are found several millennia in the past, their ethnicity often inextricably linked with their heritage. Hitherto, however, there has been no way to easily unify them and their common cultural, linguistic and historical heritage. The .PERSIANGULF gTLD will help change this.
The origins of the ethnic Persians can be traced to the Ancient Iranian peoples, who were part of the ancient Indo-Iranians and themselves part of the greater Indo-European linguistic family. The Ancient Iranian peoples arrived in parts of Iranian plateau around 2000-1500 BCE. The Old Persians were originally nomadic, pastoral people occupying the western Iranian plateau. By 850 BCE they were calling themselves the Parsa, and their constantly shifting territory Parsua for the most part localized around Persis (Pars), bounded on the west by Tigris River and on the south by Persian Gulf. The Persian Gulf is located in the southwest of the Asian Continent at 23 to 30 degrees northern latitude and 48 to 56 degrees longitude on the south side of the vast country of Iran, with a length of 1259 kilometers.
Although the Persian Gulf is not mentioned as a geographical name in to module 2 of the Applicant Guidebook, it is still well-known across the world, as is its location.
The Persian Gulf has been a valuable waterway since the beginning of history and as the venue of the collision of great civilizations of the ancient east, it has a background of several millenniums. Since centuries ago, the Ilamites used the Port of Boushehr and the Kharg Island for dwelling, shipping and ruling over the coasts of the Persian Gulf as well as transaction with the West Indies and the Nile Valley. In the Latin American geography books the Persian Gulf has been referred to as More Persicum or the Sea of Pars.

The Latin term "Sinus Persicus" is equivalent to "Persicher golf" in French, "Persico qof" in Italian, "Persidskizalir" in Russian and "Perusha Wan" that all mean "Pars".

Prior to the stationing of the Aryan Iranians on Iran's Plateau, the Assyrians named the sea in their inscriptions as the "bitter sea" and this is the oldest name that was used for the Persian Gulf.

An inscription of Darius found in the Suez Canal, used a phrase with a mention of river Pars which points to the same Persian Gulf.
During the years: 559 to 330 B.C. coinciding with the sovereignty of the Pars Empire over the Middle East area, especially the entirety of the Persian Gulf and some parts of the Arabian Peninsula, the name of Pars Sea has been widely written in the compiled texts.
In the travel account of Pythagoras, several chapters are related to description of his travels accompanied by Darioush, a king of Achaemenid, to Shoush and Perspolis, and the area is described. Among other writings from

the same period, there is an inscription and an engraving from the fifth century BC installed at the junction of the waters of Arabian Gulf (Ahmar Sea), the Nile River and the 'Rome River' (now known as the Mediterranean). In these writings, Darioush - the king of Pars Empire has named the region now know as the Persian Gulf as the Pars Sea. Other historical writings regarding the Persian Gulf include a world map drawn by Hecataeus (472 to 509 B.C.) within which the Persian Gulf and Arabian Gulf (Red Sea) have been clearly shown. Another map, drawn by Herodotus (the great historian of Greece (425-484 B.C.)), has survived and introduces Red Sea as the Arabian Gulf. Straben, the Greek historian of the second half of the first century BCE and the first half of the first century AD wrote: Arabs are living between the Arabian Gulf and the Persian Gulf.
Equally, in the world map drawn by Diseark (285-347 B.C.), the Persian Gulf and Arabian Gulf can be clearly distinguished. Myriad other maps prepared up to the 8th century by the scientists and geographical researchers such as Hecataeus, Hiparek, Claudius Batlamious, Krats Malous, and in the Islamic period, Mohammad Ibn Mousa Kharazmi, Abou Yousef Eshagh Kandi, Ibn Khardazabeh, Harrani (Batani), Masoudi, Abou Zeyd Balkhi, Estakhri, Ibn Houghal, Aboureyhan Birouni and others, mention that there is a wide sea South of Iran named the Pars Sea, Pars Gulf, Fars Sea, Fars Gulf, Bahre Fars, Sinus Persicus and Mare Persicum and so on.
Today, the most common Arabic works refer to the sea in south Iran as the "Persian Gulf", including the world famous Arabic encyclopedia 'Al-Monjad' which is the most reliable source in this respect.
While the .PERSIANGULF TLD ties back historically and culturally to the Middle Eastern people, it also has the potential to tie together the great number of people across the globe that may have any ties to or business in the region, including businesses, cultural institutions, civil society, NGOs and religious organizations.
A robust gTLD has the power to bring together people across national borders in a free-flowing exchange of information and commerce. There is not a .COM or .ORG equivalent of the .PERSIANGULF--a domain that has wide appeal across a common origin. ICANN is dedicated to creating more competition in the TLD space, and the introduction of those associating with the Persian Gulf through a .PERSIANGULF gTLD does so in one simple stroke.
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. (AGITSys) was founded by individuals of Persian origin who derive a great sense of honor and pride from their community, history and ancestry. AGITSys' founders have gathered together a team with extensive experience in Persian language on the Internet, a daunting but critical task. No entity is better suited to manage the .PERSIANGULF gTLD, nor more dedicated to providing new online tools and services to facilitate the implementation and smooth-running of this gTLD. The .PERSIANGULF gTLD will increasingly open up the vast resources of the Internet and the associated global interconnectedness to those with a close affinity to the Persian Gulf, while stimulating the introduction of more online information and resources about Persian Gulf at the same time - and AGITSys will be at the helm of this change.
The proposed TLD is, quite obviously, the name of the Persian Gulf, a region in which many people live, and from which many benefit by way of resources. The total population of the countries in the Persian Gulf region exceeds 120 million people - and all of them have a sense of belonging to Persian Gulf. The .PERSIANGULF gTLD is the perfect way to easily and simply tie together these peoples of various nations, connected geographically and historically to the Persian Gulf.

18B. How do you expect that your proposed gTLD will benefit registrants, Internet users, and others?

The benefits of the .PERSIANGULF gTLD will be manifold, not just to registrants but also to many Middle Eastern internet users who seek a unique place to do gulf-related business or develop their identity in relation to it - as well as many others with an interest in or curiosity regarding Persian Gulf. The presence of a .PERSIANGULF gTLD will increase the volume of online resources regarding the region. It will also allow existing website registrants to extend their presence to the Persian-Gulf specific audience with new .PERSIANGULF sites, while brand new registrants will emerge from those Middle Eastern populations who are currently desirous of Persian Gulf specific gTLD - adding to the value of the Internet in ways not currently possible.
As the global population expands, more people become willing Internet users and seek out second-level domains. The .PERSIANGULF gTLD is flexible, and is thus capable of being used for sites focused on ecommerce, information dissemination, charitable endeavors and many more functions among Middle Eastern people. A transformation in competition is anticipated for web sites within .PERSIANGULF, to depart from conventional methods of attracting new customers in this expanding market. This is because it will encourage competitors, targeting the diverse group of Middle Eastern Internet users with a specific interest or business tie to the Persian Gulf region. This incentive doesn't currently exist in an online space devoid of the .PERSIANGULF gTLD, where competition amongst the already saturated existing TLDs is stagnant.
We expect there to be strong demand from media, traditional and nontraditional, as well as historical and cultural organizations who want to not only use .PERSIANGULF gTLD domains as a basis for generating content and interest about the region but to also show their affiliation with the Gulf region.
There is already widespread support within the Persian Community for AGITSys' application for .PERSIANGULF. Approximately 30,000 people have signed a petition to ICANN supporting our effort. As members of the Persian community, these people recognize the importance of the .PERSIANGULF gTLD to Persians and endorse this effort. The petition can be found at http://www.ipetitions.com/petition/dot-pars/.
In terms of goals in the areas of specialty, service levels, and reputation for the proposed .PERSIANGULF gTLD, AGITSys is committed to offering choice in top level domain extensions among those interested in Persian-gulf specific domains. AGITSys is prepared to utilize its home market of Turkey as a leading source of registrants and sites, while incorporating the power of the web to connect with myriad other registrants and Internet users beyond Turkey. Further, we intend to adopt and follow the highest standards in registry operations exceeding service levels and expectations thus producing a consistent reputation.
The company is committed to bringing top-level domain registration services to registrants. To this end, AGITSys has contracted CoCCA Registry Services (NZ) Limited ("CoCCA") to provide hosted Registry Services for the .PERSIANGULF gTLD. CoCCA has over nine years experience authoring open source registry software systems and providing TLD registry support services. CoCCA was originally incorporated in Australia in 2003 as CoCCA Registry Services Limited, in January 2009 CoCCA re-located to New Zealand and trades as CoCCA Registry Services (NZ) Limited. CoCCA is a privately held NZ company.
CoCCA's clients are managers of county code top level domains (ccTLDs) as of 31 March 2012, 33 national country code top level domains ("ccTLDs") are have selected CoCCA's SRS technology or services to manage their critical infrastructure. Several other ccTLDs have committed to migration to CoCCA's "pamoja" EPP Shared Registry System ("SRS") in 2012 pending the outcome of re-delegations.
CoCCA's pamoja SRS is the most widely deployed, field-tested SRS in use today. CoCCA's SRS is a mature product that has grown organically over the past decade as new standards have been developed and published. It is doubtful any other Registry Services provider has accumulated CoCCA's level of experience operating multiple small to medium sized TLDs efficiently and securely.

AGITSys' team, including the technical advisor/member Dr. Shahram Soboutipour -who has been active on the Persian Script development for many years, is well-known in the ICANN community as a selfless champion of the interests of Persians around the world, including those who have a strong association with the Persian Gulf. We also have a long history of advising the Turkish internet industry. Our reputation is solid, and we have every incentive to maintain that reputation as we roll out the .PERSIANGULF gTLD.

Under the shepherding of AGITSys, the .PERSIANGULF gTLD will increase competition, provide more online differentiation for customers and consumers, while driving digital innovation. The addition of the .PERSIANGULF gTLD will create new competition for names within the domain name space. Not only will the offering of .PERSIANGULF domains create competition within content providers for users of Persian Gulf related content, but it is expected that competition will be enhanced among the varying service providers that users require to deploy said content. As it is rolled out, the .PERSIANGULF gTLD will rapidly develop as the gTLD of choice among those interested in content from and about the region. The demand for content from this group isn't and won't be satisfied by .COM or .ORG offerings within the current gTLDs and in fact these have hampered collaboration and innovation. The Middle Eastern people, including those who have a strong affinity with the Persian Gulf, demand content that is tailored to their own unique needs and wants, under the umbrella of a dedicated gTLD. As stated in 18(a) above, as Persian Gulf related content sites increasingly seek to differentiate themselves to consumers, and registrants seek to differentiate themselves to acquirers of second-level domains, the power to differentiate will come from innovative approaches to customer service and the creation of a trusted online environment.

It is AGITSys' mission that competition and differentiation of the .PERSIANGULF gTLD will be coupled with a user experience online that is reliable and predictable. To make this as likely as possible, AGITSys will work both with existing registrars seeking to reach new audiences, as well as new registrars that may emerge from within those with a strong interest in the Persian Gulf (be it for business or personal reasons), thereby supporting ICANN's mission to create more capacity in developing countries. AGITSys feels it can foster more competition at the registrar level by offering assistance and encouragement to new registrars in this way. We also believe that this should and will be coupled with a positive experience for Internet users. Indeed, this is critical to the success of the .PERSIANGULF gTLD. By working with the right registrars (who maintain the right, stringent) standards for adoption and use by their own customers, AGITSys can reach its goal of having the .PERSIANGULF gTLD become synonymous with a safe and trusted online experience.

Because of its dedication to those with an interest in or affinity with the Persian Gulf region, and the .PERSIANGULF gTLD which is intended to serve it, AGITSys will implement protection measures for registrations to ensure an abuse free environment whilst maintaining choice. This will be accomplished with Registration safeguards, wildcard alerts, name selection polices, all governed by an Acceptable Use Policy and post registration protections via Uniform Dispute Resolution Policy and Uniform Rapid Suspension. More details on these policies can be found in answer to Questions 28 and 29.

The privacy offered will be total, within the rules and procedures provided by ICANN. These policies will be transparent and rigorous, modeled after successful policies implemented by currently delegated TLDs and accompanied by vigilant processes and technologies to prevent unauthorized access to information. This is a manifestation of the larger goal of the .PERSIANGULF gTLD, that of a trusted source of safe online transactions, as stipulated in 18(a).

Privacy and security will be key elements of our Acceptable Use Policy (AUP). The AUP will govern how a registrant may use its registered name, with a specific focus on protecting Internet users. AUP language would specifically address privacy by prohibiting a registrant from using a domain for any activity that violates the privacy or publicity rights of another person or entity, or breaches any duty of confidentiality owed to any other person or entity. The AUP also would prohibit spam or other unsolicited bulk email, or computer or network hacking or cracking, as well as the installation of any viruses, worms, bugs, Trojan horses or other code, files or programs designed to, or capable of, disrupting, damaging or limiting the functionality of any software or hardware. We would maintain complete enforcement rights over the use of the domain name. Should a registrant find itself in breach of the AUP, we would reserve the right to revoke, suspend, terminate, cancel or otherwise modify their rights to the domain name.

In terms of outreach by the .PERSIANGULF gTLD, it is expected that the momentum around .PERSIANGULF will build quickly, given the pent-up demand that has been building for years within the ranks of the Middle Eastern people who have particular interests, or vested interests, in the Persian Gulf region. AGITSys, as its champion in gTLD discussions, knows full well how popular this service will be.

Augmenting this, AGITSys is also active in the business community within Turkey and Middle Eastern countries, and interconnected across the spectrum of the Persian-gulf affiliates due to its promotional efforts with ICANN and elsewhere. It will leverage that network to spread the word of the .PERSIANGULF gTLD in order to promote adoption. The best steps AGITSys can take to ensure the gTLD's adoption and growth, however, are to ensure a system encouraging robust, safe and dynamic second-level domain sites.

18C. What operating rules will you adopt to eliminate or minimize social costs (e.g., time or financial resource costs, as well as various types of consumer vulnerabilities)? What other steps will you take to minimize negative consequences/costs imposed upon consumers?

AGITSys will endeavor to the utmost in order to minimize the social costs to registrants of a .PERSIANGULF second-level domain, not least because AGITSys has every incentive to encourage the adoption and growth of the .PERSIANGULF domain. AGITSys has chosen to adopt CoCCA's tested acceptable use based policy matrix, recommendations for minimizing harm in TLDs, and subject the TLD to the CoCCA Complaint Resolution Service ("CRS").

The CoCCA Best practice policy matrix has been developed over a decade and has currently been adopted by 16 TLDs. It was developed for (and by) ccTLDs managers that desired to operate an efficient standards-based SRS system complemented by a policy environment that addressed a registrant's use of a string as well as the more traditional gTLD emphasis rights to string.

A key element of CoCCA's policy matrix is that it provides for registry-level suspensions where there is evidence of AUP violations. The TLD will join other TLDs that utilize the CoCCA's single-desk CRS. The CRS provides a framework for the public, law enforcement, regulatory bodies and intellectual property owners to swiftly address concerns regarding the use of domains, and the COCCA network. The AUP can be used to address concerns regarding a domain or any other resource record that appears in the zone.

The CRS procedure provides an effective alternative to the court system while allowing for Complaints against domains to be handled in a way treats each complaint in a fair and equal manor and allows for all affected parties to present evidence and arguments in a constructive forum.

AGITSys is also currently developing procedures for competition resolution regarding multiple registrations for

the same second-level domain in addition to offering the required Sunrise offerings through general availability. AGITSys will model these procedures after the techniques and approaches that have succeeded best to date.
In terms of cost, benefits, and incentives to registrants, AGITSys will offers will be fair and competitive. Competitive pricing and/or discounts will be used and adjusted accordingly to ensure the right incentive matches the phase of operation and business goals. AGITSys' business plan increases our confidence in offerings that will encourage growing adoption of the .PERSIANGULF gTLD.
Each year, AGITSys will review its financial goals versus actual performance of registry operations. Output from the analysis will include the consideration of pricing versus demand for registrations. As with any for-profit entity, adequate cash flow and predictable revenue streams are essential to successful operations. As such, AGITSys may adjust pricing of domain registrations to align with evolving business goals. Adjustments can include not only price increases, but perhaps price decreases, but only current market analysis will dictate change. Therefore, AGITSys will document in the Registrant Agreement domain price change procedures and how they can be expect to learn about changes through our communications platform. In the end, serving those with a clear affinity with the Persian Gulf through Internet technologies remains our first priority.

19. Is the application for a community-based TLD?

No

20A. Provide the name and full description of the community that the applicant is committing to serve. In the event that this application is included in a community priority evaluation, it will be scored based on the community identified in response to this question. The name of the community does not have to be formally adopted for the application to be designated as community-based.

20B. Explain the applicant's relationship to the community identified in 20(a).

20C. Provide a description of the community-based purpose of the applied-for gTLD.

20D. Explain the relationship between the applied- for gTLD string and the community identified in 20(a).

20E. Provide a complete description of the applicant's intended registration policies in support of the community-based purpose of the applied-for gTLD. Policies and enforcement mechanisms are expected to constitute a coherent set.

20F. Attach any written endorsements for the application from established institutions representative of the community identified in 20(a). An applicant may submit written endorsements by multiple institutions, if relevant to the community.

21A. Is the application for a geographic name?

No

22. Describe proposed measures for protection of geographic names at the second and other levels in the applied-for gTLD. This should include any applicable rules and procedures for reservation and/or release of such names.

Protection of Geographic Names
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has chosen CoCCA Registry Services (NZ) Limited (CoCCA) as their registry services provider. CoCCA has over 12 years of experience in authoring registry software and providing registry support services. With 35 national TLDs relying on CoCCA's technology to manage critical infrastructure, the CoCCA EPP Shared Registry System (SRS) is the most widely deployed, field-tested SRS in use today. In many respects new niche market gTLDs are predicted to more closely resemble existing ccTLD name spaces than the current gTLD ones. CoCCA's commercial model and technology enables TLD Sponsoring Organizations to focus on operating the front end portion of the registry including sales, marketing and community relations while leaving the operational aspects to the proven team at CoCCA.
In addition to technology CoCCA has a considered and tested set of leading - practice policies designed to address security, stability, rights protection, abuse mitigation, privacy and other issues, CoCCA is a trusted partner for Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. to operate the .persiangulf in a manner that is fully compliant with all ICANN rules and regulations.
CoCCA, on behalf of the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti., intends to implement the following measures to protect geographical names at the second and at all other levels within the TLD:

Reservation Measures for Geographical Names
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will adhere to Specification 5 of the proposed Registry Agreement, "Schedule of Reserved Names at the Second Level in gTLD Registries" - section 5 titled "Country and Territory Names." The geographic names listed in the following internationally approved documents will be reserved at the second level within the TLD and at all other levels where registrations occur:
(1.i.1) the short form (in English) of all country and territory names contained on the ISO 3166- 1 list, as

updated from time to time, including the European Union, which is exceptionally reserved on the ISO 3166-1 list, and its scope extended in August 1999 to any application needing to represent the name European Union
(1.i.2) the United Nations Group of Experts on Geographical Names, Technical Reference Manual for the Standardization of Geographical Names, Part III Names of Countries of the World; and
(1.i.3) the list of United Nations member states in 6 official United Nations languages prepared by the Working Group on Country Names of the United Nations Conference on the Standardization of Geographical Names.

Potential Release of Geographical Names
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. is committed to working with governments and other stakeholders that may have a concern regarding the registration of names with national or geographic significance at the second level. If Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. decides to release reserved geographical names, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will abide by the process outlined in Specification 5 of the Registry Agreement by seeking agreement from the applicable government(s). Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. understands that any release of the geographical names may be subject to Governmental Advisory Committee review and approval by ICANN.

Review, Audit, and Updates to Policies
Policy management is dynamic in nature requiring continual management. The Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. in conjunction with CoCCA's assistance will be engaged in policy development efforts in general and with respect to protections of geographical domain names. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will review and consider suggestions or concerns from government, public authorities or IGO's regarding this policy. And as with all required policies, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will perform openly and transparent should updates to existing policy or the creation of new policy be required. Further, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' internal process continually reviews and manages its reserve lists as one part of the abuse prevention mechanisms described in greater detail within question 28, "Abuse Prevention and Mitigation."

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23. Provide name and full description of all the Registry Services to be provided. Descriptions should include both technical and business components of each proposed service, and address any potential security or stability concerns.
The following registry services are customary services offered by a registry operator:

A. Receipt of data from registrars concerning registration of domain names and name servers.
B. Dissemination of TLD zone files.
C. Dissemination of contact or other information concerning domain name registrations (e.g., port-43 WHOIS, Web- based Whois, RESTful Whois service).
D. Internationalized Domain Names, where offered.
E. DNS Security Extensions (DNSSEC). The applicant must describe whether any of these registry services are intended to be offered in a manner unique to the TLD.

Additional proposed registry services that are unique to the registry must also be described.

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has contracted CoCCA Registry Services (NZ) Limited ("CoCCA") to provide hosted Registry Services for the .persiangulf TLD. The .persiangulf TLD will be added to CoCCA's existing production Shared Registry System ("SRS"). CoCCA will ensure redundant geographically diverse DNS resolution through propagation of the .persiangulf zones on the Internet Software Consortium ("ISC"), Packet Clearing House ("PCH") anycast networks - and on CoCCA unicast servers.

CoCCA authors the internet's most widely used SRS registry system (which has been branded "pamoja" for gTLD name spaces). ISC authors BIND and pioneered anycast technology, PCH has one of the internet's largest and longest running anycast networks. DNSSEC key storage and and signature will take place on the PCH DNSSEC platform, a platform developed for cccTLD's that mirrors the security and processes used by ICANN to secure the root.

The .persiangulf TLD SRS data will be escrowed with both NCC Group and CoCCA subsidiary CoCCA Data Escrow Services (NZ) Limited.

23.1 About CoCCA
CoCCA has over nine years experience authoring open source registry software systems and providing TLD registry support services. CoCCA was originally incorporated in Australia in 2003 as CoCCA Registry Services Limited, in January 2009 CoCCA re-located to New Zealand and trades as CoCCA Registry Services (NZ) Limited. CoCCA is a privately held NZ company.

CoCCA's existing clients are governments and other managers of county code top level domains (ccTLDs). As of 31 March 2012, 33 national ccTLDs have selected CoCCA's SRS technology and/or services to help them manage their critical infrastructure. Several additional ccTLDs have committed to migrate to CoCCA's "pamoja" SRS in 2012 (pending the outcome of re-delegations). As many as 40 ccTLDs are thought to be using the pamoja SRS application, while CoCCA has formal relationships and support contracts with 33 TLDs, the exact number of users is hard to determine as the pamoja software is freely available for download from the internet. CoCCA's offers ccTLDs a perpetual royalty-free license to use and deploy the SRS software.

CoCCA's commercial model is based on delivering significant economies of scale to TLD managers, CoCCA's dominant market position in the ccTLD ecosystem - where the TLD string is generally considered critical infrastructure, ensures CoCCA's commercial viability and ongoing funding of R&D regardless of the success of a particular gTLD string (or group of gTLD strings) that select CoCCA as the Registry Services provider. CoCCA's technology is mature, field tested and their commercial model is solid and not dependent on new gTLD's.

The pamoja SRS can be used several ways, the application can be downloaded and installed locally by a TLD Sponsoring Organization ("SO"), or the SO can contract CoCCA to host either the primary or failover SRS at the CoCCA Network Operations Centre ("NOC").

CoCCA's pamoja SRS is a freely available gTLD-compliant TLD database application based on the "CoCCA Tools" open source ccTLD EPP registry system. The SRS licensing simplifies failover and transition planning as the source,

data, and daily virtual machine images are to be placed into escrow enabling them to be migrated or re-deployed by a different entity without any SRS licensing issues. CoCCA's SRS is a 'shrink-wrapped" application that can be installed on a single server in minutes or deployed in a High Availability (HA) configuration.

CoCCA's pamoja SRS is the most widely deployed, field-tested SRS in use today. CoCCA's SRS is a mature product that has grown organically over the past decade as new standards have been developed and published. It is doubtful any other Registry Services provider has accumulated CoCCA's level of experience operating multiple small to medium sized TLDs efficiently and securely.

CoCCA's pamoja SRS is currently used to run three (3) Arabic (IDN) TLDs and was selected by the Telecommunications Regulatory Authority in Egypt to launch the Internet's first IDN TLD (.masr) in 2010. The flexible package supports ASCII and IDN - including variants and folding where required.

23.2 Current pamoja SRS deployments

Key - | [P] CoCCA Operated Primary SRS |[F] CoCCA Failover SRS | [E] Escrow | [S] Software Only

.af	Afghanistan	Ministry of Communications and IT	[P] [F] [E]	
.bi	Burundi	Centre National de l'Informatique	[F] [E] [S]	
.bw	Botswana	Botswana Telecoms Authority	[S] [F] [E]	
.cm	Cameroon	Cameroon Telecommunications (CAMTEL)	[S]	
.cx	Christmas Is.	Christmas Island Internet Administration Limited	[P] [F] [E]	
.ec	Ecuador	NIC.EC (NICEC) S.A.	[S]	
.eg	Egypt	Egyptian Universities Network (EUN)	[S]	
xn--wgbhlc		Egypt IDN	National Telecommunication Regulatory Authority [S]	
.ge	Guernsey	Island Networks Ltd.	[S]	
.gl	Greenland	TELE Greenland A/S	[S]	
.gs	S. Georgia	Government of South Georgia	[P] [F] [E]	
.gy	Guyana	University of Guyana	[P] [F] [E]	
.ht	Haiti	Consortium FDS/RDDH	[P] [F] [E]	
.hn	Honduras	Red de Desarrollo Sostenible Honduras*	[P] [F] [E]	
.iq	Iraq	Communications Media Commission*	[S] [F] [E]	
.je	Jersey	Island Networks (Jersey) Ltd.	[S]	
.ki	Kiribati	Ministry of Communications	[P] [F] [E]	
.ke	Kenya	Kenya Network Information Center (KeNIC)	[S]	
.mg	Madagascar	NIC-MG (Network Information Center Madagascar)	[F] [E] [S]	
.mu	Mauritius	Internet Direct Ltd	[P] [F] [E]	
.ms	Montserrat	MNI Networks Ltd	[F] [E] [S]	
.mz	Mozambique	Centro de Informatica de Universidade	[F] [E] [S]	
.na	Namibia	Namibian Network Information Center	[F] [S]	
.ng	Nigeria	Nigeria Internet Registration Association	[F] [E] [S]	
.nf	Norfolk Is.	Norfolk Island Data Services	[P] [F] [E]	
.pe	Peru	Red Cientifica Peruana	[S]	
.sb	Solomon Is.	Solomon Telekom Company Limited	[P] [F] [E]	
.sy	Syria	National Agency for Network Services	[S]	
xn--ogbpf8fl / xn--mgbtf8fl		Syria IDN	National Agency for Network Services [S]	
.tl	Timor-Leste	Ministry of Infrastructure	[P] [F] [E]	
.ps	Palestine	Ministry Of Telecommunications	[S]	
xn--ygbi2ammx	Palestine IDN	Ministry Of Telecommunications	[S]	
.zm	Zambia	ZAMNET Communication Systems Ltd.	[F] [E] [S]	

* Currently in the process of migrating away from Neustar (.iq) and Afflias (.hn)

23.3 CoCCA's Hosted SRS

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has confirmed with CoCCA their production experience and the availability of the Registry Services described briefly in sections 23.4-23.18 below - and in greater detail in the responses to questions 24-43. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. and CoCCA understand elements of ICANN's TLD requirements will most likely be modified in the future. CoCCA's Registry Services will comply with future ICANN requirements or mandates.

23.4 Receipt of Data via the SRS EPP interface

Data from Registrars concerning the insertion and maintenance of records in the SRS may be processed either via the CoCCA EPP interface (XML over SSL on port 700) or manually via CoCCA's port 443 SSL web interface. CoCCA was an early adopter of the EPP standard and has operated an EPP based SRS for almost seven years.

The .persiangulf TLD will be added to CoCCA's existing production SRS, which currently has 203 registrars connected. CoCCA's SRS has a single EPP interface for all hosted TLDs allowing registrars to share the same contact and host objects across multiple TLDS. The .persiangulf TLD will only be made accessible to ICANN accredited registrars, many of which are currently connected to CoCCA for ccTLDs and using the EPP and GUI interface that the .persiangulf TLD will be accessed via when launched.

CoCCA's pamoja EPP interface currently complies the IETF RFC's required by ICANN (5730-5734 and 3735) and is explained in more detail in the response to Question 25.

23.5 Receipt of Data via the SRS Graphical User Interface ("GUI")

Registrars may insert and manage domain, contact and host records as well as the SRS accounting functions via a port 443 GUI. Registrars do not have to use the EPP interface on port 700. Records managed via the GUI connect to the SRS EPP engine on port 700 via background processes; this ensures rigorous conformity with the RFC's and consistency in auditing and maintenance of historical records.

23.6 Registrar Data Restrictions (Reserved Names)

Restrictions on what domains may be inserted and maintained by registrars is to be controlled by configuration of java regular expressions. In order to comply with the requirements set out in Specification 5 and any Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. policy. the .persiangulf TLD will use three of pamoja's features as described below.

23.6.1 Prohibited Patterns. Domains that match patterns will be rejected with an EPP 2306 - Parameter Value Policy error, letting the registrar know that these domain names do not fit in with the registry policy for this zone.
23.6.2 Syntax Patterns. Certain strings, such as all-numeric names or single character names may be restricted. An EPP 2005 error - "Parameter Value Syntax error" will be returned to the EPP client, indicating that the name is invalid.

23.6.3 Approval Patterns. Names that match these patterns will not be rejected, but will be registered pending approval. Until they are approved, the name will not appear in the .persiangulf zone files, and will not be able to be transferred, renewed or modified in any way by the registrar.

23.6.4 Both ASCII and non-ASCII contact details can stored and displayed via web-based WHOIS and command line WHOIS.

23.7 SRS GUI, Role-Based Access
The pamoja SRS GUI has numerous role-based logins described below. Several of these have been recently developed by CoCCA in response to ICANN's proposed gTLD requirements and are currently being used numerous ccTLD production environments.

Administrative Roles

* SRS Systems Administrator - Able to administer and configure the entire SRS system
* CERT / Law Enforcement - Able to view and query the SRS, but not alter records.
* TLD Administrator - Able to administer a TLD or group of TLDs
* TLD Viewer - Able to view but not alter records for a TLD or group of TLDs
* Zone Administrator - Able to administer a Stub Zone, or group of Stub Zones
* Zone Viewer - Able to view but not alter a Stub Zone, or group of Stub Zones
* Customer Service - Can perform tasks on behalf of a number of registrars
* Name Approver - Can approve names matching the Zone Approval Patterns
* CHIP Approver - Can approve domains registered with CHIP codes or other Trademarks.

Registrar Roles

* Registrar Master Account - Able to perform all registrar functions and create subordinate logins
* Registrar Technical - Able to modify domain details
* Registrar Helpdesk - Able to view domains and make various minor changes
* Registrar Finance - Able to view domains financial transactions and also edit financial data
* Registrar Finance - (Read Only) Same as above but view only.

Other Access Roles

* Premium WHOIS - Able to perform various queries in a SRS GUI and extract and save data to a CSV, also able to connect via the SRS EPP API for read-only query.
* Zone File Only - Able to login and request Zone Files

23.8 Zone File Dissemination / Resolution

The .persiangulf will resolved by propagation of zone file data periodically extracted from the SRS, sent to PCH DNSSEC signing servers for signature, returned to CoCCA and then distributed by CoCCA's hidden master server to two redundant and independent anycast networks operated by Internet Software Consortium ("ISC" | http://isc.org) and Packet Clearing House ("PCH" | http://pch.net) - as well as two (2) public unicast TLD servers operated by CoCCA.

The .persiangulf will be resolved by a minimum of 80 geographically distributed resolvers, all of which run ISC's BIND and are configured such that they comply with relevant RFC's including 1034,1035, 1982, 2181, 2182, 2671, 3266, 3596, 3597, 3901, 4343 and 4472.

The PCH and ISC name servers employ IP-anycast technology for scalable geographic redundancy, strong defense from Denial of Service attacks, high quality of service, and give excellent (fast) responses to geographically diverse Internet users. DNSSEC and IPv6 are already fully integrated into the PCH and ISC networks.

Registrars will able to continuously inspect the availability and status of each TLD server instance via the SRS GUI and other CoCCA WEB Sites. Should a TLD server be unreachable registrars are to be automatically notified (via email) and EPP polling messages. More detailed information is available in the responses to Questions 24-43.

23.9 Dissemination of Domain Related Information

The SRS public WHOIS server will answer for the .persiangulf TLD on port 43 in accordance with RFC 3912 and the requirements set out Specification Four (4), 1.1-1.7 and Specification Ten (10), Section 4.

The CoCCA SRS features a public port 443, web-based RDDS interface that enables internet users to query and extract information which is at a minimum identical to that which is provided via the port 43 server but using technology that may be more convenient or accessible to many internet users than a port 43 command line query.

The CoCCA SRS also allows any Internet user (or any user with a login to the SRS) to order a complete Historical

Abstract delivered in an easy to understand pdf format.

Individuals may optionally subscribe to CoCCA's Premium WHOIS service, which provides them with:

* secure access to the SRS (via both a web-based port 443 GUI and read only EPP on port 700).
* the ability to perform a variety of boolean queries online in real-time and save the output to a CSV
* the ability to create "interest lists" using java regular expressions where they receive EPP polling messages and emails if a domain is registered that contains a string of interest to them.

Established CERT's and law enforcement agencies may request, and will generally be granted, read only GUI and EPP access to the CoCCA SRS free of charge. Currently this access is granted to the Australian Government CERT, who under an MOU may share information with other CERT's and national and international law enforcement agencies.

23.10 DNS Security Extension (DNSSEC)

CoCCA's SRS DNSSEC implementation allows registrars to provision public key material via EPP and the GUI. Under an agreement between CoCCA and PCH, .persiangulf TLD Keys are to be stored offline and signed using PCH's DNSSEC platform that replicates the security process, mechanisms and standards employed by ICANN in securing the ROOT of the DNS.

The CoCCA-PCH key storage implementation deviates from the ICANN model only by diversifying the locations of the secure sites such that two (2) of the three (3) sites are outside the United States. The Singapore facility is hosted by the National University of Singapore, on behalf of the Singaporean Infocomm Development Agency (IDA). The Swiss facility is hosted in Zurich by SWITCH, the Swiss national research and education network. The U.S. facility is hosted by PCH Equinix in San Jose.

The CoCCA SRS DNSSEC implementation complies with RFC's 4033, 4034, 4035, 5910, 4509, 4641 and 5155. Additional information on the DNSSEC implementation is available in the response to question 43.

23.11 Escrow Deposits

CoCCA's Registry Services include deposit of escrow data in the format and following the protocols set out in Specification Two. CoCCA currently deposits ccTLD data daily (in both the native CoCCA format and the draft arias-noguchi format) with both NCC group and CoCCA Data Escrow (NZ) Limited. CoCCA Data Escrow (NZ) Limited is a subsidiary and was established in 2009 to provide Failover Registry and escrow services to users of the CoCCA SRS who run the software locally on their own infrastructure.

As part of CoCCA's Registry Services and to ensure continuity of operations, CoCCA deposits all updates to the pamoja SRS source code with NCC, and daily VMware images of the production SRS with CoCCA Data Escrow Services (NZ) Limited. These same practices will be adopted for the .persiangulf TLD when launched.

.persiangulf SRS data will be deposited with NCC Group, CoCCA Data Escrow and ICANN. Additional information on Escrow is available the response to question 38.

23.12 Document Management
CoCCA's Registry Services include maintenance of documents related to intellectual property rights, complaints, identification of contacts, court orders etc. These documents are maintained in the SRS and become part of a domain's (or contacts) permanent history.

23.13 Support for Various Zone States

CoCCA's Registry Services support Sunrise, Rolling Sunrise, Land-rush and Open Registrations for a given zone. Each "State" can be configured to match common policy options.

23.14 Accounting

CoCCA's Registry Service's includes a variety of standardized and add-hoc reports accessible to TLD administrators via the GUI. Standardized reports include one that complies with the requirements set out in Specification Three "Format and Content for Registry Operator Monthly Reporting".

23.15 Audit Trail

All SRS activity is logged and permanently archived, it can be easily retrieved via the GUI for law enforcement or complaint resolution. A "time-machine" feature allows a user with appropriate rights to view the domain information as it existed on any given date and time. Information is never purged from the SRS, information on deleted domains, hosts, contacts can be easily extracted.

23.16 Monitoring
CoCCA's Registry Service's include statistics on and real-time monitoring of the primary NOC, CoCCA's DNS Servers, Escrow NOC (NZ) and failover NOC in Palo Alto California. Additional information is available in the answers to questions 24-42. Monitoring of the ISC and PCH anycast networks is done internally by those entities, with statistics and notices made available to CoCCA in near-real time. Where applicable and relevant monitoring information is made available to registrars by CoCCA via the SRS.

23.17 Maintenance of Failover Facilities

CoCCA Registry Services include maintenance of their geographically dispersed Escrow and Failover SRS facilities (Auckland and Palo Alto, a third is planned for Paris in early 2013).

23.18 Complaint Resolution Service (CRS)

CoCCA's Registry Services include operating a "single desk" CRS to help resolve complaints, trigger Critical

Issue Suspensions ("CIS") and enforce a Uniform Rapid Suspension ("URS") request. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will bind all registrants in the .persiangulf to the CoCCA CRS, Acceptable Use Policy and Privacy and RDDS Policy via the .persiangulf Registrant Agreement ("RA"). CoCCA's front-line CRS services are a "role" performed by CoCCA's 24/7/365 NOC Support.

23.19 Registrar Support

CoCCA Registry Services provides registrars with 24/7/365 support via email and their virtual manned Network Operations Center (NOC). The CoCCA NOC Support has staff Auckland, Sydney, Jonestown (Guyana) and Paris for around the clock coverage. CoCCA NOC Support all have access to the same cloud hosted monitoring and customer service applications as well as the SRS.

23.20 Security and Stability Audit

The pamoja SRS application is used to mange critical TLD infrastructure, each release is tested prior to release or deployment by CoCCA developers, developers and systems administrators at registries that deploy the application locally. Each major release is tested and audited by Yonita (http://yonita.com/).

CoCCA constantly reviews its SRS software and sites to ensure they meet or exceed best practices in the industry, regular external audits of the security policy and CoCCA NOC are planned commencing 2013. The CoCCA NOC and failover facilities will be independently tested twice a year to ensure compliance with the CoCCA security policy, where applicable recommendations included in a security audit will be swiftly implemented.

23.21 Operational Testing and Evaluation (OT&E) Environment

CoCCA's Registry Service's include the operation of an OT&E SRS that enables registrars to evaluate new versions and features of the SRS software before they are deployed by CoCCA in production. Any ICANN accredited registrar will be granted access to OT&E. Registrars not currently connected to the CoCCA SRS will be required by CoCCA to demonstrate competency in EPP and the .persiangulf policies before being granted EPP or GUI access to CoCCA's production SRS.

23.22 Authorization Key Retrieval

CoCCA's Registry Service's include automated public retrieval of domain AuthCodes by the administrative contact via a port 443 web page. The Authorization Key facilitates expedited transfers from one registrar to another.

23.23 Public Drop - List

CoCCA's Registry Services include publication of drop-lists of domains that are pending purge via a port 443 web page and email reports to registrars.

23.24 Wildcard Brand Registrations

A mechanism thought to be unique to the CoCCA SRS that allows blocking registration of a domain's "variants" using java regular expressions. This requires approval and manual intervention on the part of CoCCA.

23.25 Co-operation with Law Enforcement and CERTs

CoCCA works with Law Enforcement, CERTs and researchers and will generally grant registry continuous access free of charge to facilitate two-way data exchanges aimed at preventing and mitigating abuse in the DNS.

There are no known security or stability issues with the CoCCA's SRS, PCH's DNSSEC platform or ISC's and PCH's anycast networks at this time. Should any be identified resources are available internally at CoCCA, PCH and ISC to swiftly address and resolve security or stability issues as they arise.

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24. Shared Registration System (SRS) Performance:
describe

- the plan for operation of a robust and reliable SRS. SRS is a critical registry function for enabling multiple registrars to provide domain name registration services in the TLD. SRS must include
  the EPP interface to the registry, as well as any other interfaces intended to be provided, if they are critical to the functioning of the registry. Please refer to
  the requirements in Specification 6 (section 1.2) and Specification 10 (SLA Matrix) attached to the Registry Agreement; and
  • resourcing plans for the initial implementation of, and ongoing maintenance for, this aspect of the criteria (number and description of personnel roles allocated to this area).
  A complete answer should include, but is not limited to:
- A high-level SRS system description;
- Representative network diagram(s);
- Number of servers;
- Description of interconnectivity with other registry systems;
- Frequency of synchronization between servers; and
- Synchronization scheme (e.g., hot standby, cold standby).

The .persiangulf TLD will be added to CoCCA's existing SRS, which currently has its primary Network Operations Centre (NOC) in Sydney Australia. The Sydney primary SRS is a single SRS instance currently hosting a dozen ccTLDs. CoCCA's Sydney SRS runs the latest versions of their "pamoja" TLD software application in a High Availability (HA) configuration. The Sydney SRS registry that will host .persiangulf currently complies with the requirements Specifications 4, 6 and 10 and will be scaled or modified to meet SLA requirements or any future ICANN gTLD specifications. Because of CoCCA's commercial model and technology the primary SRS can be moved from one data center to another with only a few minutes outage.

From an Internet users perspective trusted, secure and responsive DNS implementations are the ultimate objective of Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. To ensure this CoCCA will use PCH's DNSSEC and anycast infrastructure for offline storage, signing and resolving the .persiangulf TLD, additional DNS resolution will be provided by the ISC SNS anycast platform and two CoCCA unicast DNS servers. Additional information and technical details on the DNSSEC and anycast DNS services can be found in the answers to questions 34, 35 and 43.

24.1 Scale of Operations
A decade of operational experience with TLDs that have implemented polices to discourage tasting or otherwise incentivize add-drop registrations confirms the widely held belief that SRS registry databases are largely static. Once registered data associated with a domain is not frequently modified. More than 99% of the queries seen by CoCCA on a daily basis are WHOIS, EPP Domain:Info or Domain:Check queries (read queries) and do not tax a SRS's resources excessively. Direct experience and anecdotal evidence from other small and mid-sized registries suggest that between 2% and 5% of the records in the register change daily through db "write" operations - new registrations, renewals, name server changes, contact updates automated changes of status, transfers etc.

For a theoretical registry of 1 million domains this equates to roughly 50,000 "write" transactions a day - or an average of 35 a min (50,000 / 1440 min/day). A recent test of CoCCA's SRS software on an single 8GB cloud server revealed that the pamoja software was able to process 4 million unique EPP registrations in a little over 5 hours. Performance tests can be designed in any number of ways, real world performance depends on a variety of factors- the specific policy and account settings for a given zone.

In terms of both transactional capability and storage, todays "off the rack" hardware and the open source PostgreSQL database used by CoCCA can easily cope with demands that a small to medium sized registry is ever likely to make on an SRS system. While the CoCCA SRS EPP and WHOIS infrastructure and platform may seem comparatively modest, a decade of experience confirms it is more than capable of meeting the ICANN's gTLD SLA requirements and comply with the required RFC's.

If future demands require it, CoCCA's SRS can easily (and affordably) be scaled by adding additional load balanced application servers and bandwidth.

24.1 SRS | High Level Description

Comprehensive information on and descriptions of the CoCCA SRS and NOC may be found the answers to questions 25-42 that follow.

24.1.1 SRS Infrastructure / Architecture
The following describes the key features of CoCCA"s current production SRS that will be utilized for the .persiangulf:

* Primary SRS is operated from Global Switch, a tier 3 + facility and one of the largest carrier-neutral data centers in the Southern Hemisphere.
http://www.globalswitch.com/en/locations/sydney-data-center

* Redundant links to the Internet through PIPE networks and Telstra
http://www.pipenetworks.com/
http://www.telstra.com.au/

* DNSSEC Key storage (offline) in Singapore at a PCH facility hosted by the National University of Singapore, on behalf of the Singaporean Infocomm Development Agency (IDA). Failover storage at a facility is hosted in Zurich by SWITCH, the Swiss national research and education network and in the U.S. at facility is hosted by Equinix in San Jose.

* .persiangulf zones signed by PCH in Frankfurt or Palo Alto

* SRS Escrow at tier three co-location facility (Maxnet) in Auckland NZ and Failover a tier four facility (Equnix) supported by PCH in Palo Alto, CA US. A fourth SRS "instance" is planned for Paris in early 2013.

* Dedicated, routable CoCCA Critical Infrastructure IPv4 and IPv6 address blocks.
IPv4 resources: 203.119.84.0/24 (crit-infra)
IPv6 resources: 2001:dd8:3::/48 (crit-infra)

* Routers, Firewalls, Switches and Load balancers all configured for failover.

* CoCCA"s pamoja SRS application load balanced and configured for failover.

* PostgesSQL 9.1.3 database replicated synchronously to two secondary DB servers.

* DS Keys lodged by registrars via EPP or the CoCCA SRS GUI

* Servers Virtualized (VMware vsphere v5)

* VM image-based replication for high availability and off-site disaster recovery http://www.veeam.com/vmware-esx-backup.html

* Critical Data continuously replicated asynchronously to two off-site SRS instances - PCH, Equinix Palo Alto CA (pch.net) and CoCCA Data Escrow (NZ) Limited, Auckland NZ (maxnet.co.nz)

* OT&E Environment for Registrars

* Primary and Secondary hidden master DNS (failover masters).

* CoCCA operated unicast DNS in Sydney Australia and Auckland New Zealand.

* Two anycast solutions operated by PCH and ISC - over 80 DNS nodes.

24.1.2 Specification 6, Section 1.2 Compliance.

The .persiangulf TLD will be added to CoCCA"s production SRS that currently hosts 12 ccTLDs under a single RFC 5730-5743, RFC 5910 and 3915 compliant EPP interface.

A list of the Registrars that currently connect to the CoCCA SRS for one or more ccTLDs follows bellow.

24.2 EPP Interface

The port 700 EPP interface for .persiangulf will listen on the same IP and port as the EPP server for the other TLDs hosted by CoCCA - currently "production.coccaregistry.net:700", on launch the production EPP interface for .persiangulf will be branded as epp.nic.persiangulf.

24.3 WHOIS Interface (port 43 and 443)

The WHOIS Interface(s) for .persiangulf will listen on the same IP and port as the WHOIS server for the ccTLDs and prospective gTLDs to be hosted by CoCCA - currently "whois.coccaregistry.net:43/443" on launch the interface for .persiangulf will be branded as "whois.nic.persiangulf". Each TLD (ccTLD/ gTLD) in the CoCCA SRS may have different WHOIS disclosure settings based on the TLD policy. The .persiangulf will comply with the ICANN gTLD disclosure requirements.

24.4 GUI Interface (port 443)

The GUI Interface for .persiangulf will listen on the same IP and port as the GUI server for ccTLDs and prospective gTLDs to be hosted by CoCCA - currently https://production.coccaregistry.net:443. On launch, the interface for .persiangulf will be branded as "registry.nic.persiangulf".

24.5 Hidden Master DNS (s) (port 53)

The there are two hidden master servers. CoCCA will transfer the .persiangulf zone from the "signature master" to PCH for DNSSEC signature using TSIG IXFR / AXFR and IP restrictions at the OS and firewall level. PCH will sign the Zone and transfers it back to CoCCA using TSIG and IXFER/ AXFER, CoCCA will then loads the zone on a second "distribution master" which allows distribution to the PCH and ISC anycast transfer points and the CoCCA unicast DNS servers.

24.6 CoCCA Public Unicast DNS
DNS servers on virtual machines running BIND in the Sydney NOC and NZ SRS will pull and resolve the .persiangulf TLD zones.

24.7 Public anycast DNS

CoCCA's distribution master notifies the anycast providers (PCH and ISC) and .persiangulf TLD zones are transferred to the respective provider's transfer point IPs (hidden IPS for DNS transfers only) using TSIG IXFER / AXFR and then propagated by PCH and ISC across their respective anycast networks.
24.8 ftp Server
Server to distribute zone files as required under Specification 4 Section 2.

24.9 Escrow Server
Server used to deposit TLD data with NCC and transfer data to CoCCA"s Failover and Escrow SRS. Uses Secondary IP range.

24.10 Number of Servers
There are seven physical server appliances in Sydney NOC configured such that they host 17 virtual machines.

24.11 High Availability (HA) Configuration

The Sydney NOC's network appliances are configured for failover and HA in either hot or warm standby mode. The PostgreSQL databases are locally replicated using 9.1.3's synchronous replication and asynchronously over the WAN to the Failover facilities. The status of the local and off-site replication is continuously monitored by the CoCCA NOC. CoCCA also ships WAL files so that in the event of an extend WAN outage the offsite SRS can be updated using Point in Time Recovery (PITR).

RDDS and EPP services are load balanced between two different application servers at the primary SRS (more application servers can easily be added). Public read-only RDDS may also load balanced by simply having the nagios monitoring software automatically modify the resource records and send WHOIS traffic to either of the secondary / failover SRS's for near-real time WHOIS, When the primary becomes available or SLA issues (DoS etc) are resolved, RDDS services are automatically switched back to the primary SRS.

The public IPs at the NOC used for EPP, WHOIS and GUI are on routable critical infrastructure ranges assigned to CoCCA by APNIC. In the event of an issue with the primary Internet link at the Sydney NOC (PIPE networks) CoCCA may either modify A and AAA records for GUI / RDDS and EPP services to the local failover link, or the entire IP range can be re-routed using BGP routing to a COCCA failover SRS. If the entire Sydney NOC suffers an extended outage the traffic can be routed to the the failover SRS (Palo Alto) or Escrow SRS (Auckland) as conditions dictate by either modification of resource records (A, cname) or BGP of the CoCCA AS.

VMware images of all virtual machines are made daily using Veeam Backup & Replication software

In addition to streaming replication, SRS data is sent to CoCCA's failover SRS and Escrow sites every 10 minutes (or sooner depending on activity) via SCP in the form of postgresql PITR files, and daily in the form of compressed database dumps and VMware images.

24.12 List of Registrars Connected to the CoCCA SRS in Sydney AU as of March 30, 2012

Name	Country
12idn Limited	NZ
1API GmbH	DE

3w Media GmbH	DE							
abayard	HT							
AB NameISP	SE							
Active24 .CZ	CZ							
AFGNIC Registrar					AF			
AGJ Times		GB						
Alpha Communications Network					HT			
Ascio Technologies				DK				
Atlantis North Ltd				GB				
Automattic Inc	US							
DomainReg	DE							
Bamik Network Information						AF		
BBCWYSE Technology Co. Ltd						MU		
BB Online UK Limited						GB		
Beijing Guoxu Network						CN		
Bizcn.com, Inc.	CN							
Biz.Vi Networks Ltd.						HT		
Blacknight Internet Solutions							IE	
Brights Consulting Inc.						JP		
Brown Domain Services				HT				
cctldnames	GY							
Cogent IPC		SE						
Com Laude	GB							
Communigal Communication Ltd						IL		
Connect-Ireland	IE							
Core | Council of Registrars							CH	
CPS-Datensysteme GmbH			DE					
Cronon AG		AF						
Corporation Service Company						CA		
Consortium For Success, Inc.						US		
Cybernaptics Ltd				MU				
DA Domains	DM							
DANILOU.COM	HT							
Digital Technology					GY			
Dinahosting SL	ES							
Dipcon AB		SE						
documentdata anstalt						LI		
DomainClub.com	US							
Domaine.fr		FR						
Domaininfo AB	SE							
DomainKeep	US							
Domain The Net Technologies						IL		
Dominiando IT	IT							
Dynamic Network Services						US		
E-advert Ltd	MU							
Easy Line Host	FI							
Easyspace Ltd	GB							
Encirca	US							
Enet Corporation				JP				
enom		US						
Entorno Digital S.A				ES				
EPAG Domainservices				DE				
Euro Billing Grona Verket AB							SE	
EuroDNS	LU							
IVX B.V.		NL						
FBS	TR							
FING GLOBAL NETWORK Inc			JP					
Fody Technologies Ltd.						MU		
FRCI eServices Ltd					MU			
Gabia, Inc		KR						
Gandi SAS		FR						
Gastein IT Services						AT		
Gauss research Laboratory, Inc.						PR		
Guyananet		GY						
Government Online Centre (MU)						MU		
GoHoto Pty Ltd	AU							
Golden Internet	RU							
GRAFIKLIF-WebalaMinute			HT					
Gransy s.r.o.	CZ							
GUYANANET	GY							
HAICOM (HAITI Communications)					HT			
HAINET S.A.	HT							
Haiti Domain	HT							
Haqmal ICT Solution Services						AF		
Hikaru Kitabayashi				JP				
Holomedia		FR						
ht_hostmicrofos	HT							
Hostnet bv		NL						
Ultraspeed UK	GB							
FSM II	FM							
HTG	HT							
GaMa Consulting S.A.						HT		
Koborg	MU							

Indeca GmbH	DE						
INDOMCO	FR						
Innovative Systems				GY			
Innter.Net		CY					
Instra Corporation				AU			
IntaServe		AU					
InterNetworX Ltd. & Co. KG						DE	
InterNetX GmbH	DE						
Indian Ocean Territories						CX	
IP Mirror Pte Ltd				SG			
Iron Mountain IPM			US				
Interactivetool.biz					MU		
Jestina Mesepitu				SB			
Jms-Networks (TM)				GB			
J SQUAD SYSTEMS INC.				AF			
Kawing Chiu	US						
Keiichi SHIGA (old: Keiichi dot business)						JP	
Key-Systems	DE						
Klute-Thiemann GmbH			DE				
Knipp	DE						
Larsen Data	DK						
Legekko Info Ltd				MU			
Lexsynergy Limited				GB			
LGLovells		FR					
MailClub (France)			FR				
Marcaria.com	US						
Marcus Cake	AU						
MARIDAN InterNET GmbH		DE					
MarkMonitor	US						
Maudeline Auguste					HT		
MediaWars CO LTD				JP			
Melbourne IT CBS AB					SE		
Domainbox		GB					
MICROCIS		AF					
Moniker Online Services, LLC.						US	
Mauritius Domains				MU			
Naikbeen_NCP	AF						
LIVING BY BLUE CO.,LTD			JP				
NameAction	CL						
Name.com LLC	US						
Nameshield	FR						
NameWeb BVBA	BE						
NATCOM S.A	HT						
National Computer Board			MU				
Nemesys Ltd	MU						
Nessus GmbH	AT						
NetAccess / AccessHaiti S.A.							HT
NetNames Ltd	GB						
Net-Chinese Co., Ltd.					TW		
NETCOM S.A.	HT						
NETLINKS		AF					
Network Solutions, LLC			US				
Networking4all	NL						
Mauritius.biz Hosting				MU			
Nexus	GB						
NICE S.r.l. d/b/a niceweb.eu							IT
Norfolk Island Data Services							NF
Novagroup		HT					
Novutec Inc.	US						
OFFICE DE MANAGEMENT ET DE RESSOURCES HUMAINES	HT						
MB OPTIMAL SYSTEMS LTD			GB				
Our Telekom	SB						
OVH	FR						
OXWELL CC	VG						
Multilink S.A	HT						
Peweb Ltda	BR						
PlanA Corp		AI					
pointcruz.com	SB						
pro.vider.de	DE						
Quick Net		HT					
Redspider.biz	GY						
register_com	US						
Register.it spa	IT						
Register.mu	MU						
Register.eu	BE						
Domain Name Registration Service Reg.Net.Ua				UA			
101Domain, Inc.	US						
RWGUSA	US						
Safenames	GB						
Solomon Telekom	SB						
Solutions S.A.	HT						
SpeedPartner GmbH			DE				
studio28		GY					

SunnyNames LLP	US					
TainoSystems	HT					
Telecommunications Authority of Kiribati						KI
Telecom Plus Ltd				MU		
TierraNet Inc.	US					
Timor Hosting	TL					
TradeMark Unlimited, Inc					US	
Todaynic.com,Inc.				HK		
TPP Domains Pty Ltd				AU		
I.C.S. Trabia-Network S.R.L.						MD
TRANSNET S.A	HT					
TRANSVERSAL	HT					
Timor Telecom	TL					
Tucows	CA					
ugcit	GY					
UNICART Ltd.	BG					
united-domains AG				DE		
Variomedia AG	DE					
Melbourne IT DBS, Inc.						US
V-Trade Ltd		MU				
Visiant Outsourcing S.r.l.						IT
Web Commerce Communications WebCC				MY		
WEB Development and Hosting Ltd			MU			
WEB Ltd	MU					
Web Solutions ApS				DK		
WebWorkers Internet Consultants cc						NA
NamIT cc Namibia					NA	
WSR Corporation	GB					
Xcess Interactive					GY	
Xin Net Technology Corp .			CN			

25. Extensible Provisioning Protocol (EPP): provide a detailed description of the interface with registrars, including how the applicant will comply with EPP in RFCs 3735 (if applicable), and 5730-5734.
If intending to provide proprietary EPP extensions, provide documentation consistent with RFC 3735, including the EPP templates and schemas that will be used.
Describe resourcing plans (number and description of personnel roles allocated to this area).
A complete answer is expected to be no more than 5 pages. If there are proprietary EPP extensions, a complete answer is also expected to be no more than 5 pages per EPP extension.

CoCCA was among the first registry providers to embrace the EPP standard seven years ago. CoCCA's traditional clients have been small to medium sized ccTLD operators un-encumbered by the legal, contractual and governance issues that often result in protracted delays in rolling out new policy, technology or standards in larger ccTLDs or in the gTLD environment. CoCCA and the users of its SRS software have been historically free to trial and introduce innovative technology policy.

The CoCCA SRS is an "all in one" software package (RDDS/ EPP/ GUI / Accounting) however this does not prevent it from being deployed in a clustered environment where multiple instances answer for a specific protocol under a load balanced, high availability environment. Using a load balance appliance EPP traffic can be sent to one or more servers which are in turn connected to the same database. In all small to medium sized deployments tested to date load balancing the EPP service is not required - the load balancer is simply configured to provide failover and HA.

An aggressive three-year development program commenced in January 2009 with the objective of ensuring CoCCA's software was compliant with ICANN's new gTLD requirements - as well as the meeting needs of new and existing users in the ccTLD community.

25.1 Current EPP RFC Compliance:

RFC 5730 Extensible Provisioning Protocol (EPP)

This RFC is a base protocol document for EPP. EPP is an XML-text object based client-server protocol, atomic in its transactions, and developed to support multiple transports and lower level security protocols. There are no partial failures; all commands either succeed or fail definitively. Object-to-object associations are standard with limited application of parent-child relationships where delegate relationships are necessary for affected functionality, such as internal host data and its relationship to domain objects. The pamoja SRS fully implements the service discovery, commands, responses, and the extension framework described.

RFC 5730

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RFC 5731

This RFC explains the mapping of the primary EPP registry object, the domain object. It reviews associated attributes and states of the domain object as well as child object relationships (hosts). It also details associations with other contact objects. The pamoja SRS complies with the full XML examples and descriptions and applies flexibility where permitted. For example, 5731 allows operators to implement the info command with

different responses for a "sponsoring registrar" and a "non-sponsoring registrar" in regards to many domain object attributes. The pamoja SRS implements this as a base protocol document for EPP.

RFC 5732

The pamoja SRS implements this as a base protocol document for EPP. The pamoja SRS notes this RFC describes the mapping of relationships to host objects, which are by definition subordinate to the superordinate domain name object. Host objects that are defined as internal or in the namespace of the registry must be related to a superordinate domain object to be created. Internal hosts, as full child objects, face restrictions associated with the management of their superordinate domain object. External hosts are hosts belonging to another domain namespace and as such are not subordinate in the present namespace. Internal hosts can have a glue or an A record associated with them, external hosts refer to another namespace or zone for the associated A record.

RFC 5733

Another RFC implemented in the The pamoja SRS server, this RFC describes the contact object mappings in EPP. Contact objects are used to contain related data surrounding the standardized contacts types in TLD registries including attributes such as contact type, country, telephone numbers, email addresses, etc. As a standalone object, a contact object can be created and associated with no domain objects or with any number of domain objects available in the registry. This is used commonly by registrars to update common contact information associated across large numbers of domains in a single transaction. Like the domain object, it can be secured with a passphrase or "authinfo" code. Contact object data represents the definitive data source for authoritative RDDS (WHOIS) in new TLDs.

RFC 5734

The pamoja SRS implements this RFC as the preferred industry transport and in compliance with ICANN's requirements. This RFC describes a standard implementation of TCP incorporating TLS. The transport of choice for the EPP registry community has been TCP. Implementers are encouraged to take precautions against denial of service attacks through the use of standard technologies such as firewall and border router filters.

RFC 5735

The pamoja SRS implements this RFC as applicable to any extensions it utilizes as this RFC provides specific and detailed guidance on EPP extensions. An important principle in creating extensions to, as opposed to modifying, the EPP protocol was to fully preserve the integrity of the existing protocol schema. Additionally, a valid extension itself should be extensible. Another important requirement in the RFC is to include announcements of all available extensions in the EPP server greeting element before establishing an interactive client session.

RFC 3915

The pamoja SRS supports this extension since this all CoCCA managed TLDs implement the grace period implementation known as the Redemption Grace Period or "RGP". When RGP is in use, domains are deleted into the RGP where Registrars may request a restoration of the domain. This is a billable event and requires a three-step process: placement of the domain into a pending restore state, submission of a restore report explaining why the domain is being restored, and finally the restoration of the domain. The RFC extends the domain update command, adds related domain statuses, such as "redemptionPeriod" and "pendingRestore," and extends the responses of domain info and other details. The RFC provides a lifecycle description of the RGP and defines the format and content for client to server submission of the associated restore reports.

RFC 5910

The pamoja SRS will support DNSSEC and therefore will also support this extension from initiation of the registration process. DNSSEC is a mechanism for cryptographically verifying that each delegate zone in the DNS hierarchy has been referred to or is referring to its genuine parent or child zone respectively. Since TLD zone files are generated from authoritative registry data, this extension specifically provides the ability to add elements to the domain-create and domain-update functions and to the domain-info responses, allowing registrars to submit associated delegated signer (DS) information of the child zone indicating it is digitally signed and that the parent zone recognizes the indicated key as a valid zone key for the child zone.

SRS General

The pamoja SRS Session Management - pamoja listens on port 700 for client requests.
The pamoja SRS Message Exchange - pamoja complies with the EPP message exchange rules
The pamoja SRS Data Unit Format - pamoja uses the prescribed packet formats

25.2 EPP Security:

CoCCA's SRS performs username/clid/password/ssl certificate checks and also contains application level code to restrict connections to a set of IP addresses for each client and login.

Additional security is provided by firewall IP restrictions that restrict port 700 access to the SRS to trusted IP's and the use of stateful firewalls and load balancing devices to mitigate DoS attacks or other malicious activity.

25.3 EPP - Demonstrating Capability

CoCCA authors the most widely deployed EPP SRS solution and has a long history of both development of and production experience operating an EPP SRS. The CoCCA NOC currently has 12 TLDs on it's production EPP SRS, over 20 TLD managers have deployed the CoCCA EPP solution locally for production use.

In order to demonstrate capability and compliance with the RFC's in 24.1 and CoCCA's Extensions in 25.3. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has instructed CoCCA to make available to evaluators an

Operational and Testing and Evaluation (OTE) EPP interface should they desire to evaluate CoCCA's RFC compliance. Alternatively, evaluators may download CoCCA's pamoja SRS, install locally and contact CoCCA for configuration advice.

The URL to download pamoja is https://downloads.coccaregistry.net. Installers are available for Linux64x (Centos / Ubuntu), OSX (10.6+) and WIN7+ servers.

25.3 EPP Extensions

The CoCCA SRS currently provides several extensions to EPP, using the practices defined in RFC-3735. The CoCCA greeting currently defines the following four extensions:

```
...
 (svcMenu)
...
 (objURI) urn:ietf:params:xml:ns:host-1.0 (/objURI)
 (svcExtension)
 (extURI) urn:ietf:params:xml:ns:rgp-1.0 (/extURI)
 (extURI) https://../cocca-ip-verification-1.1 (/extURI)
 (extURI) https://../cocca-contact-proxy-1.0 (/extURI)
 (extURI) https://../cocca-contact-proxy-create-update-1.0 (/extURI)
 (extURI) https://../cocca-reseller-1.0 (/extURI)
 (/svcExtension)
 (/svcMenu)
...
```

25.3.1 Registry Grace Period Extension

```
 (extURI) urn:ietf:params:xml:ns:rgp-1.0 (/extURI)
```

Implemented as defined in RFC-3915 - http://www.ietf.org/rfc/rfc3915.txt

25.3.2 Reseller Mapping Extension

```
 (extURI) https://../cocca-reseller-1.0 (/extURI)
```

Extensions for Domain:Create and Domain:Update

This extension tags a domain as being registered via one of registrars' resellers. The reseller reference is provided in the reference section, and is recorded against the domain as it is registered or updated. The reseller list must be maintained by the Registrar through the CoCCA Registry web interface.

If a registrar decides to load reseller information and map domains, the .persiangulf WHOIS server (port 43 and 443), Historical Abstracts, and Premium WHOIS will display the reseller contact information as well as the Registrar information. If ICANN advises that display of reseller information in the port 43 WHOIS is inconsistent with the response format required in Specification 4, 1.4.2 then CoCCA will disable port 43 and or port 443 display of reseller data for the .persiangulf TLD. Reseller information would still be stored and available for Historical Abstracts and users of the CoCCA's Premium WHOIS service.

```
 ("xml version="1.0" encoding="UTF-8"")

  (xs:schema targetNamespace="https://production.coccaregistry.net/cocca-reseller-1.0"
            xmlns="https://production.coccaregistry.net/cocca-reseller-1.0"
            xmlns:xs="http://www.w3.org/2001/XMLSchema"
            elementFormDefault="qualified")

    (xs:element name="extension")
        (xs:complexType)
            (xs:sequence)
                (xs:element name="reference" type="xs:string"/)
            (/xs:sequence)
        (/xs:complexType)
    (/xs:element)
  (/xs:schema)

 (extension)
  (reseller:extension xmlns:reseller="https://production.coccaregistry.net/cocca-reseller-1.0")
  (reseller:reference) XXXXX (/reseller:reference)
  (/reseller:extension)
 (/extension)
```

25.3.3 Clearinghouse for Intellectual Property Extension

Extension to connect to an external database to validate IP rights.

```
 (extURI) https://../coccaregistry.net/cocca-ip-verification-1.1 (/extURI)
```

Extension for Domain:Create

```
 (?xml version="1.0" encoding="UTF-8"?)

 (xs:schema targetNamespace="https://../cocca-ip-verification-1.1"
           xmlns="https://production.coccaregistry.net/cocca-ip-verification-1.1"
           xmlns:xs="http://www.w3.org/2001/XMLSchema"
           elementFormDefault="qualified")

     (xs:annotation)
         (xs:documentation)
```

```
            Extensible Provisioning Protocol v1.0
            Extension for providing IP Verification to CoCCA Registries

            v1.1 adds extra fields for trademark verification
        </xs:documentation>
    </xs:annotation>

    <xs:element name="extension">
        <xs:complexType>
            <xs:choice>
                <xs:element name="chip" type="chipType"/>
                <xs:element name="trademarks" type="trademarkType"/>
            </xs:choice>
        </xs:complexType>
    </xs:element>

    <xs:complexType name="chipType">
        <xs:sequence>
            <xs:element name="code">
                <xs:simpleType >
                    <xs:restriction base="xs:token">
                    <xs:maxLength value="255"/>
                    <xs:minLength value="1"/>
                  </xs:restriction>
                </xs:simpleType>
            </xs:element>
        </xs:sequence>
    </xs:complexType>

    <xs:complexType name="trademarkType">
        <xs:sequence>
            <xs:element name="trademark" minOccurs="1" maxOccurs="unbounded">
                <xs:complexType>
                    <xs:sequence>
                        <xs:element name="registeredMark">
                            <xs:simpleType>
                                <xs:restriction base="xs:token">
                                    <xs:maxLength value="255"/>
                                    <xs:minLength value="1"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:element>
                        <xs:element name="registrationNumber">
                            <xs:simpleType>
                                <xs:restriction base="xs:token">
                                    <xs:maxLength value="255"/>
                                    <xs:minLength value="1"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:element>
                        <xs:element name="registrationLocality">
                            <xs:simpleType>
                                <xs:restriction base="xs:token">
                                    <xs:pattern value="[A-Z]{2}"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:element>
                        <xs:element name="capacity">
                            <xs:simpleType>
                                <xs:restriction base="xs:token">
                                    <xs:enumeration value="OWNER"/>
                                    <xs:enumeration value="ASSIGNEE"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:element>
                        <xs:element name="companyNumber" minOccurs="0">
                            <xs:simpleType>
                                <xs:restriction base="xs:token">
                                    <xs:maxLength value="255"/>
                                    <xs:minLength value="1"/>
                                </xs:restriction>
                            </xs:simpleType>
                        </xs:element>
                    </xs:sequence>
                </xs:complexType>
            </xs:element>
        </xs:sequence>
    </xs:complexType>
</xs:schema>
```

This extension allows registrars to provide proof of their Intellectual Property claim for a name, when registering. It can be used to specify Clearing House for IP codes, or Trademarks. A CHIP request XML is as

follows:

```
(extension)
(coccaip:extension xmlns:coccaip="https://../cocca-ip-verification-1.1")
(coccaip:chip)
(coccaip:code) XXXXXXX (/coccaip:code)
(/coccaip:chip)
(/coccaip:extension)
(/extension)
```

An extension containing trademark information is as follows:

```
(extension)
(coccaip:extension xmlns:coccaip="https://../cocca-ip-verification-1.1")
(coccaip:trademarks)
(coccaip:trademark)
(coccaip:registeredMark) CoCCA (/coccaip:registeredMark)
(coccaip:registrationNumber) 12345 (/coccaip:registrationNumber)
(coccaip:registrationLocality) NZ (/coccaip:registrationLocality)
(coccaip:capacity) OWNER (/coccaip:capacity)
(coccaip:companyNumber) 1234 (/coccaip:companyNumber)
(/coccaip:trademark)
(/coccaip:trademarks)
(/coccaip:extension)
(/extension)
```

At the time of application it is not envisioned that this extension will be used for the .persiangulf TLD. However it demonstrates an existing technical capacity to query and synchronize data with external databases in order to validate IP or other rights.

25.3.4 Contact Proxy Extension

(extURI) https:// epp.ote.persiangulf.coccaregistry.net/cocca-contact-proxy-1.0 (/extURI)
Extension to allow registrars to lodge several sets of contact details for a given domain and select which one is displayed in the port WHOIS.

https://production.coccaregistry.net/cocca-contact-proxy-1.0 and https://production.coccaregistry.net/cocca-contact-proxy-create-update-1.0 - extensions for Contact:Create and Contact:Update.

```
(?xml version="1.0" encoding="UTF-8"?)

(xs:schema targetNamespace="https://production.coccaregistry.net/cocca-contact-proxy-create-update-1.0"
           xmlns="https://production.coccaregistry.net/cocca-contact-proxy-create-update-1.0"
           xmlns:proxy="https://production.coccaregistry.net/cocca-contact-proxy-1.0"
           xmlns:xs="http://www.w3.org/2001/XMLSchema"
           xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
           xsi:schemaLocation="https://production.coccaregistry.net/cocca-contact-proxy-1.0 cocca-contact-proxy-
1.0.xsd"
           elementFormDefault="qualified")

  (xs:import namespace="https://production.coccaregistry.net/cocca-contact-proxy-1.0" schemaLocation="cocca-
contact-proxy-1.0.xsd"/)

  (xs:annotation)
    (xs:documentation)
     Extensible Provisioning Protocol v1.0

     Extension for creating or updating a contact, with proxy information. This proxy information
     is provided as a WHOIS response, instead of the contact's real information if zone settings
     allow. Proxy information may be specified in full, by providing all the details or by using a
     reference to a previous contact proxy info. If you want to clear a contact's proxy info, send
     an existingProxy type request with an empty reference string.
    (/xs:documentation)
  (/xs:annotation)

  (xs:element name="extension")
    (xs:complexType)
      (xs:choice)
        (xs:element name="newProxy" type="proxyType"/)
        (xs:element name="existingProxy")
          (xs:complexType)
            (xs:sequence)
              (xs:element name="reference" type="proxy:referenceType"/)
            (/xs:sequence)
          (/xs:complexType)
        (/xs:element)
      (/xs:choice)
    (/xs:complexType)
  (/xs:element)

  (xs:complexType name="proxyType")
    (xs:sequence)
      (xs:element name="proxyDetails")
```

```
        (xs:complexType)
          (xs:sequence)
            (xs:element name="reference" minOccurs="0" type="proxy:referenceType")
                (xs:annotation)
                  (xs:documentation)
                   This is an optional field you can use to give this proxy info a particular reference.
                   Each reference must be unique, so if you have an existing contact proxy info record
                   with this reference value, you will UPDATE that record, changing the proxy info for
                   any existing contact referencing that proxy.

                   If you don't specify a reference, one will be created for you and returned in the EPP
                   response.
                  (/xs:documentation)
                (/xs:annotation)
            (/xs:element)
            (xs:element name="email")
              (xs:simpleType)
                (xs:restriction base="xs:token")
                  (xs:maxLength value="255"/)
                  (xs:minLength value="1"/)
                (/xs:restriction)
              (/xs:simpleType)
            (/xs:element)
            (xs:element name="voice" type="proxy:phoneNumberType"/)
            (xs:element name="fax" minOccurs="0" type="proxy:phoneNumberType"/)
            (xs:element name="internationalAddress" type="proxy:addressType"/)
            (xs:element name="localAddress" type="proxy:addressType" minOccurs="0"/)
          (/xs:sequence)
        (/xs:complexType)
      (/xs:element)
    (/xs:sequence)
  (/xs:complexType)

  (xs:element name="resData")
    (xs:annotation)
      (xs:documentation)
       If a contact is created or updated with contact proxy information specified, or if the registrar
       creating the contact has a default proxy specified, then the reference value identifying the proxy
       is returned in the response, in the extension/resData field described here.  If the contact was updated
to
       clear the reference field (i.e. setting the contact's proxy using the existingProxy type, but leaving
       the reference field empty) then the reference value will be empty, confirming the update.
      (/xs:documentation)
    (/xs:annotation)
    (xs:complexType)
      (xs:sequence)
        (xs:element name="reference" type="proxy:referenceType"/)
      (/xs:sequence)
    (/xs:complexType)
  (/xs:element)
(/xs:schema)


(?xml version="1.0" encoding="UTF-8"?)

(xs:schema targetNamespace="https://production.coccaregistry.net/cocca-contact-proxy-1.0"
           xmlns="https://production.coccaregistry.net/cocca-contact-proxy-1.0"
           xmlns:xs="http://www.w3.org/2001/XMLSchema"
           elementFormDefault="qualified")

  (xs:simpleType name="referenceType")
    (xs:restriction base="xs:token")
      (xs:maxLength value="40"/)
      (xs:minLength value="0"/)
    (/xs:restriction)
  (/xs:simpleType)

  (xs:complexType name="phoneNumberType")
    (xs:sequence)
      (xs:element name="number")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="64"/)
            (xs:minLength value="1"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="extension" minOccurs="0")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="64"/)
            (xs:minLength value="1"/)
          (/xs:restriction)
```

```
        (/xs:simpleType)
      (/xs:element)
    (/xs:sequence)
  (/xs:complexType)

  (xs:complexType name="addressType")
    (xs:sequence)
      (xs:element name="street1")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="1"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="street2" minOccurs="0")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="0"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="street3" minOccurs="0")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="0"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="city")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="1"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="stateProvince" minOccurs="0")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="0"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="postcode" minOccurs="0")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:maxLength value="255"/)
            (xs:minLength value="0"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
      (xs:element name="countryCode")
        (xs:simpleType)
          (xs:restriction base="xs:token")
            (xs:pattern value="[A-Z]{2}"/)
          (/xs:restriction)
        (/xs:simpleType)
      (/xs:element)
    (/xs:sequence)
  (/xs:complexType)
(/xs:schema)
```

This extension allows the association of a contact proxy with a contact.

The contact:create and contact:update extensions can specify an existing proxy contact by ID. or create a new proxy contact. To associate a contact with an existing contact proxy, use this form:

```
(extension)
(proxyupdate:extension xmlns:proxyupdate="https://production.coccaregistry.net/cocca-contact-proxy-create-update
-1.0")
(proxyupdate:existingProxy)
(proxy:reference xmlns:proxy="https://production.coccaregistry.net/cocca-contact-proxy-1.0") XXXXX
(/proxy:reference)
(/proxyupdate:existingProxy)
(/proxyupdate:extension)
(/extension)
```

where XXXXX is the ID of the proxy contact you wish to use. To create a new contact and associate it with a contact, use this form of the create or update extension:

```
(extension)
(proxyupdate:extension xmlns:proxyupdate="https://production.coccaregistry.net/cocca-contact-proxy-create-update
-1.0" xmlns:proxy="https://production.coccaregistry.net/cocca-contact-proxy-1.0")
(proxyupdate:newProxy)
(proxyupdate:proxyDetails)
(proxy:reference) XXXXX (/proxy:reference)
(proxy:email) XXXXX (/proxy:email)
(proxy:voice)
(proxy:number) XXXXX (/proxy:number)
(proxy:extension) XXXXX (/proxy:extension)
(/proxy:voice)
(proxy:internationalAddress)
(proxy:street1) XXXXX (/proxy:street1)
(proxy:street2) XXXXX (/proxy:street2)
(proxy:city) XXXXX (/proxy:city)
(proxy:stateProvince) XXXXX (/proxy:stateProvince)
(proxy:postcode) XXXXX (/proxy:postcode)
(proxy:countryCode) XXXXX (/proxy:countryCode)
(/proxy:internationalAddress)
(/proxyupdate:proxyDetails)
(/proxyupdate:newProxy)
(/proxyupdate:extension)
(/extension)
```

At the time of application it is not envisioned that this extension will be used for the .persiangulf TLD.

Other:

In addition to the above statuses, the CoCCA Registry provides additional lifecycle statuses over and above those defined in RFC-5731. The CoCCA Activation statuses are provided using namespaced status elements in the Domain:Create and Domain:Info responses, and are accompanied by an RFC-3735 compliant extension section. A Domain:Create response for a newly registered domain would appear as follows:

```
(?xml version="1.0" encoding="UTF-8" standalone="no"?)

(epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
    (response)
        (result code="1000")
            (msg) Command completed successfully (/msg)
        (/result)
        (msgQ count="229" id="21192"/)
        (resData)
            (domain:infData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
                (domain:name) info.confirm.test (/domain:name)
                (domain:roid) 234511-CoCCA (/domain:roid)
                (domain:status s="inactive") Delegation information has not been supplied (/domain:status)
                (activation:status xmlns:activation="https://production.coccaregistry.net/cocca-activation-1.0"
s="pendingActivation")
                    This domain requires acceptance of AUP and registrant agreement by 2012-02-29 10:19
                (/activation:status)
               (domain:registrant) regis-80ESBqGtje (/domain:registrant)
                (domain:clID) registrar (/domain:clID)
                (domain:crID) registrar (/domain:crID)
                (domain:crDate) 2012-02-21T21:19:32.887Z (/domain:crDate)
                (domain:exDate) 2013-02-21T21:19:33.006Z (/domain:exDate)
                (domain:authInfo)
                    (domain:pw) Hh7Wz3c9dC (/domain:pw)
                (/domain:authInfo)
            (/domain:infData)
        (/resData)
        (extension)
            (rgp:infData xmlns:rgp="urn:ietf:params:xml:ns:rgp-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:rgp-1.0 rgp-1.0.xsd"/)
            (activation:extension xmlns:activation="https://production.coccaregistry.net/cocca-activation-1.0")
                (activation:url) https://registry-adam/activate.jsp?
activationCode=ITIhi1kma8SmbCsYefY18uEaJikwOXKNLOMLu0HHXkXjZUynrDZZUh6SB2h8h1D8 (/activation:url)
                (activation:link) /activate.jsp?
activationCode=ITIhi1kma8SmbCsYefY18uEaJikwOXKNLOMLu0HHXkXjZUynrDZZUh6SB2h8h1D8 (/activation:link)
            (/activation:extension)
        (/extension)
        (trID)
            (clTRID) CR-4 (/clTRID)
            (svTRID) 1329859182069 (/svTRID)
        (/trID)
    (/response)
(/epp)
```

25.4 EPP Access Requirements

1. IP Address white listing (firewall and application layer)

2. Signed registry issued SSL certificates
3. Username/Password

Authentication requires that the IP address the connection is made from be white listed IP, that the entity connecting use a CoCCA-issued SSL certificate and that correct clientID and passwords be used. By default registrars have only GUI access to the SRS, EPP is enabled by request and only after a Registrar has been certified on CoCCA's OT&E platform.

25.5 CoCCA GUI Environment
In addition to providing the standard implementation of EPP that runs on Port 700, CoCCA also provides a secure web based Graphical User Interface running on Port 443 that allows Registrars to register and manage domains in their portfolio without connecting by EPP.

25.6 EPP Via the GUI
In cases where a registrar uses the SRS GUI, all domain, host and contact operations supported by the RFC's are executed by pamoja's internal EPP engine to ensure that GUI and port 700 EPP interfaces behave identically.

These methods of authentication include:
1. IP Address white listing
2. Using a one-time password ("OTP") delivered via hardware token, soft token or SMS is issued by CoCCA.
3. The use of a Username/Password

25.7 Registrars
A list of registrars that have already successfully integrated and connected to CoCCA's SYD SRS is attached. CoCCA's SYD SRS is used by 200+ Registrars, many of which currently utilize the XML based EPP protocol for the purpose of providing automated services to their clients.
25.8 Resourcing and Continuous Development

CoCCA's software development team and systems administrators support both their own in-house SRS and that of over 23 other TLD managers who have deployed the pamoja SRS software locally on their own infrastructure. Development is on-going and active. The CoCCA SRS has been developed over the past 9 years, the bulk of the development on the EPP platform has been completed, however two full time developers are employed by CoCCA to customize, maintain and improve the software for the TLD's that use it.

Because of the co-operative nature of the development process CoCCA works closely with over a dozen developers and network engineers employed by users of CoCCA's TLD software to resolve bugs, continuously improve pamoja's performance and add new features.

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26. Whois: describe

- how the applicant will comply with Whois specifications for data objects, bulk access, and lookups as defined in Specifications 4 and 10 to the Registry Agreement;
- how the Applicant's Whois service will comply with RFC 3912; and
- resourcing plans for the initial implementation of, and ongoing maintenance for, this aspect of the criteria (number and description of personnel roles allocated to this area).

A complete answer should include, but is not limited to:

- A high-level Whois system description;
- Relevant network diagram(s);
- IT and infrastructure resources (e.g., servers, switches, routers and other components);
- Description of interconnectivity with other registry systems; and

Frequency of synchronization between servers.
To be eligible for a score of 2, answers must also include:

- Provision for Searchable Whois capabilities; and
- A description of potential forms of abuse of this feature, how these risks will be mitigated, and the basis for these descriptions

A complete answer is expected to be no more than 5 pages.

CoCCA currently delivers proven, innovative WHOIS and Registration Data Directory Services ("RDDS") technology to the TLDs hosted by CoCCA and to the TLDs that deploy the pamoja SRS on their own infrastructure. CoCCA's Specification Four compliant WHOIS and RDDS technology will be utilized by CoCCA for the .persiangulf TLD. Under CoCCA's SRS Architecture one WHOIS server will answer for all the TLDs in the SRS. Each TLD Sponsor can configure the WHOIS such that it serves different results depending on the wishes of the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. and applicable ICANN requirements.

26.1 WHOIS Architecture and Infrastructure Overview

CoCCA"s flexible WHOIS architecture is designed for high availability, complies with RFC 3912 and surpasses the requirements in Specifications 4 and 10. The flexible pamoja WHOIS server may be configured to provide a variety of information, and in a variety of formats that supplements ICANN's proposed gTLD requirements.

As registrations appear (or are modified) in the registration database, changes are committed to a replicated read only secondary database utilized by CoCCA's WHOIS server. Because the replication is synchronous WHOIS data is presented in real time. If at a future date WHOIS query response times becomes an SLA issue, WHOIS responses may be cached using "infinite cache" horizontal caching technology, which has been tested and can readily scale to meet future demand, alternatively RDDS services may be answered by a SRS instance off-site (one of the CoCCA secondary/failover SRS's) for near real-time WHOIS and RDDS.

26.2 Port 43 WHOIS (command line)

CoCCA has confirmed that the format of the domain status, individual and organizational names, address, street, city, state/province, postal code, country, telephone and fax numbers, email addresses can and will be configured to conform to the mappings specified in EPP RFC"s 5730-5734. The originating IP address and date time of all WHOIS queries are logged and will be stored for a minimum of 28 days in the production SRS.

GUI configuration and command line flags allow a client to request output in ASCII, Unicode, ASCII and Unicode or HTML output (with tables). For IDN TLDs, a variety of command line WHOIS options have been tested in conjunction with the Arabic TLDs that use the CoCCA SRS. CoCCA supports all the current IETF standards and several developed for current IDN users. CoCCA's SRS can be readily modified should ICANN mandate a particular technology in the future.

26.2.1 Domain Name Data:
* Proposed Production Query format: whois "h -whois.nic. (TLD) domain
* Response format: Currently compliant with Specification 4, Section 1.4.2 (pages 40-41).

26.2.2 Registrar Data:
* Proposed Production query format: whois "h -whois.nic.persiangulf registrar
* Response format: Currently compliant with Specification 4, Section 1.5.2 (pages 41-42) -- with the exception of the registrar "WHOIS Server" object (p. 42), under the proposed .persiangulf thick registry model registrars will not operate their own WHOIS servers.

Inclusion of this object seems redundant and may cause confusion regarding the authoritative WHOIS server for the .persiangulf. If required by ICANN the registrar WHOIS object data will be collected and displayed by CoCCA.

26.2.3 Name Server Data:
* Proposed Production Query format: whois "h -whois.nic. (TLD) (Host or IP)
* Response format: Currently compliant with Specification 4, Section 1.6.2 (p. 42)

26.3 Public WHOIS service via a secure port 443 web-based interface:
CoCCA"s pamoja software has a publicly accessible port 443 GUI service that allows individuals to query the SRS for registration data for individual domain, registrar or host records.

CoCCA has confirmed that the format of the domain status, individual and organizational names, address, street, city, state/province, postal code, country, telephone and fax numbers, email addresses can and will be configured to conform to the mappings specified in EPP RFC"s 5730-5734.

To prevent abuse, CoCCA implements rate limiting via CAPTCHA for each individual transaction. The procedure would follow as per below.

1) An individual would navigate in a browser to https://whois.nic. (TLD)
2) Click on the appropriate button (Domain, Registrar, or Name Server)
3) Enter the applicable parameter:
----Domain name, including the TLD (e.g., EXAMPLE.TLD)
----Full name of the registrar, including punctuation (e.g., Example Registrar, Inc.)
----Full host name or the IP address (e.g., NS1.EXAMPLE.TLD or 198.41.3.39)
4) Enter the CAPTCHA phrase or symbols
5) Click on the Submit button

Possible Outcomes from the query:
* If an exact match for the domain, host, or registrar exists in the SRS, the Port 443 WHOIS will display the same information and with the same formatting, as the port 43 WHOIS (see above and Specification 4, Sections 1.4 " 1.6).

* If there is no exact match but a super-ordinate domain exists the SRS data for the super- ordinate name is to be displayed. By way of example if an individual searches for abc.domain.persiangulf and abc.domain.persiangulf does not exist then the SRS would display the information on domain.persiangulf and advise the individual accordingly.

26.4 WHOIS and RDDS | Demonstrating Capability

CoCCA has almost a decade of experience running multiple TLDs and providing WHOIS services. WHOIS and RDDS are integrated into CoCCA"s pamoja software. In order to demonstrate capability and compliance with the Specification Four, Section One, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has instructed CoCCA to make available to evaluators an Operational and Testing and Evaluation (OTE) WHOIS and RDDS interface on request. Alternatively, evaluators may download CoCCA's pamoja SRS, install locally and contact CoCCA for configuration advice.

The URL to download pamoja is https://downloads.coccaregistry.net. Installers are available for Linux64x (Centos / Ubuntu), OSX (10.6+) and WIN7+ servers.

26.5 Network Diagrams

CoCCA's RDDS services serve data directly from the SRS, there is no separate WHOIS database. If performance becomes and issue pamoja's RDDS read-only services can be configured to extract data from a replicated copy of the SRS.

Individuals or entities that desire to run multiple queries against the SRS for law enforcement purposes, IP protection or to mitigate cyber-crimes need simply subscribe to CoCCA's Premium RDDS Service and may query the SRS via EPP as well as port 43 and the 443 GUI. Premium RDDS users are granted EPP read-only access (on request) and need not be ICANN Accredited registrars. In many cases EPP may be a better tool for automation of multiple queries than port 43 WHOIS.

The systems supporting WHOIS are fully redundant with hardware and software that can easily scale to meet the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.'s growth projections of the TLD. For comprehensive description of the SYD NOC see questions 31 and 32.

The WHOIS server at the CoCCA Data Centre in Sydney currently answers for 12 TLDs and processes on average fewer than 8000 WHOIS requests per hour. The current WHOIS server and database has been tested and can answer in excess of 9,000 TPS as currently configured - network latency may impact real world results depending on the origin of the query.

26.6 Synchronization Frequency Between Servers

CoCCA's WHOIS architecture is designed to ensure WHOIS data is current, accurate and reliable. CoCCA's RDDS services serve data directly from the SRS, in the default configuration there is no separate WHOIS database. CoCCA uses PostgreSQL and synchronous replication data is committed to the production SRS master database and a secondary database (read only) server configured to serve WHOIS data, so that at all times the SRS and CoCCAs WHOIS servers serve the same data.

CoCCA streams SRS data off-site asynchronously (and by log file shipping as a failover) to their SRS servers in Palo Alto and Auckland to enable those SRS's to serve near-real time WHOIS data if the primary SRS experiences an issue that negatively impacts CoCCA's ability to meet SLA's for the .persiangulf TLD.

If WHOIS caching is required as the .persiangulf TLD grows, compliance with the SLA requirements in the ICANN agreement may necessitate that Failover SRS or Escrow SRS answer RDDS queries or that cache servers be deployed, in such a circumstance, the WHOIS response would be near real-time (accurate to within a min or two of the primary SRS).

26.7 Compliance with Specification 4

CoCCA will provide free RDDS Services via both port 43 and a web-based port 443 site in accordance with RFC 3912.

Additionally, the CoCA will also provide fee-based Premium RDDS service described in further detail below. CoCCA and the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. acknowledge that ICANN reserves the right to specify alternative formats and protocols and if such change were to occur; CoCCA will implement specification changes as soon as practical.

CoCCA and the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will provide bulk access of thin RDDS data to ICANN to verify and ensure operational stability of registry services, as well as to facilitate compliance checks on accredited registrars. Access will be provided to ICANN on a weekly basis and the format will be based on section 3 of Specification 4. Further, exceptional access to thick RDDS will be provided to ICANN per Specification 2.

Should ICANN request it CoCCA will provide ICANN with a Premium RDDS login at no charge which will provide them with continuous access to the SRS to extract thick SRS data for the .persiangulf at its leisure.

The proposed format of the data objects for domains, name servers , and the registrar output are provided below:

1.4. Domain Name Data:
1.4.1. Query format: whois EXAMPLE.TLD
1.4.2. Response format:
Domain Name: EXAMPLE.TLD
Domain ID: D1234567-TLD
WHOIS Server: whois.example.tld
Referral URL: http://www.example.tld
Updated Date: 2009-05-29T20:13:00Z
Creation Date: 2000-10-08T00:45:00Z
Registry Expiry Date: 2010-10-08T00:44:59Z Sponsoring Registrar: EXAMPLE REGISTRAR LLC Sponsoring Registrar IANA ID: 5555555
Domain Status: clientDeleteProhibited Domain Status: clientRenewProhibited Domain Status: clientTransferProhibited Domain Status: serverUpdateProhibited Registrant ID: 5372808-ERL
Registrant Name: EXAMPLE REGISTRANT Registrant Organization: EXAMPLE ORGANIZATION Registrant Street: 123 EXAMPLE STREET
Registrant City: ANYTOWN
Registrant State/Province: AP
Registrant Postal Code: A1A1A1
Registrant Country: EX
Registrant Phone: +1.5555551212
Registrant Phone Ext: 1234
Registrant Fax: +1.5555551213
Registrant Fax Ext: 4321
Registrant Email: EMAIL@EXAMPLE.TLD Admin ID: 5372809-ERL
Admin Name: EXAMPLE REGISTRANT ADMINISTRATIVE Admin Organization: EXAMPLE REGISTRANT ORGANIZATION Admin Street: 123 EXAMPLE STREET
Admin City: ANYTOWN
Admin State/Province: AP
Admin Postal Code: A1A1A1
Admin Country: EX
Admin Phone: +1.5555551212
Admin Phone Ext: 1234
Admin Fax: +1.5555551213
Admin Fax Ext:
Admin Email: EMAIL@EXAMPLE.TLD
Tech ID: 5372811-ERL
Tech Name: EXAMPLE REGISTRAR TECHNICAL

```
Tech Organization: EXAMPLE REGISTRAR LLC
Tech Street: 123 EXAMPLE STREET
Tech City: ANYTOWN
Tech State/Province: AP
Tech Postal Code: A1A1A1
Tech Country: EX
Tech Phone: +1.1235551234
Tech Phone Ext: 1234
Tech Fax: +1.5555551213
Tech Fax Ext: 93
Tech Email: EMAIL@EXAMPLE.TLD
Name Server: NS01.EXAMPLEREGISTRAR.TLD
Name Server: NS02.EXAMPLEREGISTRAR.TLD
DNSSEC: signedDelegation
DNSSEC: unsigned
) ) )  Last update of WHOIS database: 2009-05-29T20:15:00Z  ( ( (

1.5. Registrar Data:
1.5.1. Query format: whois "registrar Example Registrar, Inc." 1.5.2. Response format:
Registrar Name: Example Registrar, Inc. Street: 1234 Admiralty Way
City: Marina del Rey
State/Province: CA
Postal Code: 90292
Country: US
Phone Number: +1.3105551212 Fax Number: +1.3105551213
Email: registrar@example.tld
WHOIS Server: whois.example-registrar.tld
Referral URL: http://www. example-registrar.tld
Admin Contact: Joe Registrar
Phone Number: +1.3105551213
Fax Number: +1.3105551213
Email: joeregistrar@example-registrar.tld
Admin Contact: Jane Registrar
Phone Number: +1.3105551214
Fax Number: +1.3105551213
Email: janeregistrar@example-registrar.tld
Technical Contact: John Geek
Phone Number: +1.3105551215
Fax Number: +1.3105551216
Email: johngeek@example-registrar.tld
) ) )  Last update of WHOIS database: 2009-05-29T20:15:00Z  ( ( (

1.6. Nameserver Data:
1.6.1. Query format: whois "NS1.EXAMPLE.TLD" or whois "nameserver (IP Address)" 1.6.2. Response format:
Server Name: NS1.EXAMPLE.TLD
IP Address: 192.0.2.123
IP Address: 2001:0DB8::1
Registrar: Example Registrar, Inc.
WHOIS Server: whois.example-registrar.tld
Referral URL: http://www. example-registrar.tld
) ) )  Last update of WHOIS database: 2009-05-29T20:15:00Z  ( ( (

26.8    Supplemental Data
Subject to ICANN Approval, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will ensure the SRS is
configured to display of the following Supplemental RDDS data (objects only displayed if applicable).

Activation Expiry Date: 2011-12-31T11:11:11Z
Activation Date: 2011-12-31T11:11:11Z
Contact Confirmation Expiry Date: 2011-12-31T11:11:11Z
Contact Confirmation Date: 2011-12-31T11:11:11Z
Registration Grace Expiry Date: 2011-12-31
Registration MIN Expiry Date: 2011-12-31
Redemption Expiry Date: 2011-12-31
Purge Date: 2011-12-31
Renewal Grace Expiry Date: 2011-12-31
Transfer Grace Expiry Date: 2011-12-31

Reseller ID: 4261797-ERL
Reseller Name: ACME Reseller A
Reseller Street: 123 RESELLER STREET
Reseller City: RESELLER VILLE
Reseller State/Province: RS
Reseller Postal Code: 12345
Reseller Country: US
Reseller Phone: +1.5555551219
Reseller Phone Ext: 1239
Reseller Fax: +1.5555551219
Reseller Fax Ext: 4329
Reseller Support Email: helpdesk@reseller. (TLD)

26.9    Compliance with Specification 10

CoCCA's WHOIS service will comply and/or exceed the Registration Data Directory Service (RDDS) performance
```

specifications outlined in Specification 10 of the proposed Registry agreement. For the existing TLDs supported by CoCCA, all service levels already exceed the Specification 10 Requirements:

* RDDS Availability) 98%
* RDDS Query) 95%
* RDDS Update) 95%

CoCCA"s current RDDS availability statistics are available online at http:⁄⁄stats.coccaregistry.net

RDDS Services that are near real time can be provided from the failover or escrow SRS's by simply changing the IP⁄ CNAME for the whos.nic.[TLD] if there are SLA related or loading issues. This has been tested and is being done automatically at any time by CoCCA's monitoring software with near immediate effect (30 seconds.

26.10 Historical Abstracts

In addition to CoCCA's RDDS services, detailed Historical Abstracts for individual domains are also made readily available to the general public, law enforcement and rights owners.

Historical Abstracts are a compilation of all information available on a domain (including deleted ⁄ archived domains) that are held in the registry. This includes the time and date of all changes in contacts, hosts, registrars, resellers, status's as well as all registration, activation, confirmation, renewal, restore or commercial transactions related to the maintenance of domain in the SRS.

A representative sample of a Historical Abstract detailing the full history of a domain is attached.

26.11 Premium RDDS (port 443 and port 700 EPP)

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti., with the service support of CoCCA, intends to offer Boolean partial and exact match search capability of all Domain, Contact, Host, Registrar data in the SRS within the Directory Service via a web interface. This Premium service will be billed at a monthly rate depending on the number of queries.

ICANN's requirement that thin SRS data be made available in bulk makes it trivial for any entity who has thin data provided by the Centralized Zone Data Access Provider to run automated queries against the .persiangulf WHOIS pubic WHOIS server and extract thick SRS data - for all the domains in a zone. CoCCA's Premium RDDS makes access to registration data by IP Owners, Law Enforcement and CERT's efficient (EPP and GUI) and timely (real-time), Premium RDDS does not expose any information that ICANN's gTLD policy does not effectively require Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. to otherwise make publicly available to the public via WHOIS and the services of CZDA Provider.

Because experience has demonstrated that entities often attempt to use the WHOIS for a variety of purposes, rights protection, research etc., and because WHOIS is a rather blunt instrument which does not provide always provide the most useful advice on reserved domains, wildcard string registrations etc. entities with a Premium RDDS Service will, on request, be granted read-only EPP access to retrieve domain information.

In order to make it unnecessary for IP owners or others to continuously query the SRS via EPP or command line WHOIS subscribers to the Premium RDDS may create lists that use regular java expressions and boolean operations that will notify them by email and if applicable EPP polling messages when a domain that matches a given string is registered.

To mitigate abuse of this feature, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will implement the following measures to ensure legitimate authorized users and ensure the feature is in compliance with any applicable privacy laws or policies:

* Premium RDDS subscribers must agree, as a condition of access to comply with Section 2.1.5 of Specification 4.To monitor that RDDS services are not being abused and used to "support the transmission by e- mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than user's own existing customers, or (ii) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-accredited registrar" CoCCA will seed the SRS with unique records and that enable them to track reported abuse back to an individual RDDS subscriber.

* Because this is only offered as a premium and paid service, the request must follow the CoCCA application process to confirm the user identification and process the financial transaction. Thus, the typical end-user will not have access to this service.

* All GUI searches are conducted via authenticated user access using a combination of username and password and OTP tokens.

* CoCCA will monitor for out of band usage patterns of the Premium RDDS service and take appropriate action if policy thresholds are exceeded.

26.12 Zone File Access

Subscribers to the Premium RDDS may download .persiangulf zone files via the port 43 GUI up to six (6) times in any 24 hour period.

CoCCA will comply all the requirements set out in Specification 4, Sections 2.1-2.1.7. Specifically, CoCCA will operate a dedicated server supporting FTP, and or other data transport access protocols in a manner specified by ICANN and the Centralized Zone Data Access Provider.

26.13 Resource Plans

The .persiangulf TLD will be added to CoCCA's SRS at their primary data center in Sydney which currently supports the features noted above.

The Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will dedicate 2 professionals to coordinate the operation of the .persiangulf TLD. At the same time, the technical professionals at CoCCA will be supporting the vast majority of the technical aspects of operating the .persiangulf TLD.

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27. Registration Life Cycle: provide a detailed description of the proposed registration lifecycle for domain names in the proposed gTLD. The description must:

- explain the various registration states as well as the criteria and procedures that are used to change state;
- describe the typical registration lifecycle of create/update/delete and all intervening steps such as pending, locked, expired, and transferred that may apply;
- clearly explain any time elements that are involved - for instance details of add-grace or redemption grace periods, or notice periods for renewals or transfers; and
- describe resourcing plans for this aspect of the criteria (number and description of personnel roles allocated to this area).

The description of the registration lifecycle should be supplemented by the inclusion of a state diagram, which captures definitions, explanations of trigger points, and transitions from state to state.
If applicable, provide definitions for aspects of the registration lifecycle that are not covered by standard EPP RFCs.
A complete answer is expected to be no more than 5 pages.

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will adopt the CoCCA harmonized life cycle currently adopted by a dozen ccTLDs. The .persiangulf life-cycle described bellow builds on the CoCCA technology and policy launched in November 2011 that sought to increase the accuracy of WHOIS data, minimize harm and increase consumer trust in TLDs. The life-cycle for the .persiangulf TLD builds on the traditional gTLD life-cycle by adding direct Registrant-Registry interaction.

The proposed .persiangulf life-cycle ensures key elements of the .persiangulf TLD abuse prevention and mitigation framework are adhered to by delaying mapping of the Registrant's desired NS delegation information until the registrant has Activated a domain. All .persiangulf registrations are provisional until Activated. Activation requires that the registrant confirm (with CoCCA) the accuracy of the contact information lodged by the registrar and reads agrees to the .persiangulf Registrant Agreement (RA), AUP and Privacy RDDS Policy.

Activation takes place via automated processes that store the time : date and IP address of the Activation as part of the domains history.

Registrants will also be required to confirm (with CoCCA) the accuracy of the contact details and agreement with the .persiangulf RA, AUP and Privacy RDDS Policy at a) the time of renewal, b) on transfer and c) on the anniversary of registration. The following Life-Cycle describes the CoCCA SRS EPP and WHOIS behavior at various stages in the Life-Cyle.

27.1 Registration | Initial Registration

Not Registered
SRS EPP domain:check response

```
 (?xml version="1.0" encoding="UTF-8" standalone="no"?)
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
   (response)
     (result code="1000")
       (msg) Command completed successfully (/msg)
     (/result)
     (msgQ count="309" id="21153"/)
     (resData)
       (domain:chkData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
         (domain:cd)
           (domain:name avail="1") no-exist.example (/domain:name)
         (/domain:cd)
       (/domain:chkData)
     (/resData)
     (trID)
       (clTRID) 1333577979408 (/clTRID)
       (svTRID) 1333577979414 (/svTRID)
     (/trID)
   (/response)
 (/epp)
```

SRS WHOIS response

```
$ whois no-exist.example
Domain Name: no-exist.example
Domain Status: Available

TERMS OF USE:  (Legal Notice)

) ) )  Last update of WHOIS database:  2012-04-04T10:55:27.634Z  ( ( (
```

Note if a string cannot be registered for policy reasons the following the SRS will return the following. EPP domain:check Status

```
 (?xml version="1.0" encoding="UTF-8" standalone="no"?)
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
```

```
  (response)
    (result code="1000")
      (msg) Command completed successfully (/msg)
    (/result)
    (msgQ count="309" id="21153"/)
    (resData)
      (domain:chkData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
        (domain:cd)
          (domain:name avail="0") profanity.example (/domain:name)
          (domain:reason) Registry policy (/domain:reason)
        (/domain:cd)
      (/domain:chkData)
    (/resData)
    (trID)
      (clTRID) 1333579251148 (/clTRID)
      (svTRID) 1333579251168 (/svTRID)
    (/trID)
  (/response)
(/epp)

WHOIS Status Display

$ whois profanity.example
Domain Name: profanity.example
Domain Status: Not Registered
Notes: This name is not allowed by the policy of this registry, and cannot be registered

) ) )  Last update of WHOIS database:  2012-04-04T10:55:27.634Z  ( ( (

--------------------------------------

Registered | Status "Pending Activation"

The Activation and Confirmation requirements run in parallel to Grace, MIN, Pending Delete, Pending Purge and
other SRS states. As soon the application is lodged via the SRS EPP and WHOIS servers will return the following.

EPP domain:info Status

 ("xml version="1.0" encoding="UTF-8" standalone="no"")
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
   (response)
     (result code="1000")
       (msg) Command completed successfully (/msg)
     (/result)
     (msgQ count="309" id="21153"/)
     (resData)
       (domain:infData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
         (domain:name) pending.example (/domain:name)
         (domain:roid) 1234-CoCCA (/domain:roid)
         (domain:status s="inactive") Delegation information has not been mapped (/domain:status)
         (activation:status xmlns:activation="https://production.coccaregistry.net/cocca-activation-1.0"
s="pendingActivation") This domain requires acceptance of AUP and registrant agreement by 2012-04-09 15:39
 (/activation:status)
         (domain:registrant) example (/domain:registrant)
         (domain:clID) adam (/domain:clID)
         (domain:crID) adam (/domain:crID)
         (domain:crDate) 2012-04-02T03:39:55.925Z (/domain:crDate)
         (domain:exDate) 2013-04-02T03:39:55.942Z (/domain:exDate)
         (domain:authInfo)
           (domain:pw) example (/domain:pw)
         (/domain:authInfo)
       (/domain:infData)
     (/resData)
     (extension)
       (activation:extension xmlns:activation="https://production.coccaregistry.net/cocca-activation-1.0")
         (activation:url)
https://registry.example/activate.jsp"activationCode=Q7DCanzCN1REmVnB1gjVIasJnLLMa4pacVRLn6ev9kc6sFppcs7FHLfX3PLPM
         (/activation:url)
         (activation:link)
          /activate.jsp"activationCode=Q7DCanzCN1REmVnB1gjVIasJnLLMa4pacVRL n6ev9kc6sFppcs7FHLfX3PLPM3x0
         (/activation:link)
       (/activation:extension)
     (/extension)
     (trID)
       (clTRID) TR-2 (/clTRID)
       (svTRID) 1333581085177 (/svTRID)
     (/trID)
   (/response)
 (/epp)
```

WHOIS Status Display Example

```
$ whois pending.example
Domain Name: pending.example
Domain ID: 12345-CoCCA
WHOIS Server: whois.example
Referral URL:
Updated Date: 2012-02-07T03:51:17.543Z
Creation Date: 2010-03-04T04:15:10.423Z
Registry Expiry Date: 2015-07-04T04:15:10.434Z
Sponsoring Registrar: Example Registrar
Sponsoring Registrar IANA ID: 1234
Domain Status: pendingActivation

Registrant ID: 12345-CoCCA
Registrant Name: Example Registrant
Registrant Organization: Example Org
Registrant Street: 1 Example Rd
Registrant City: Exampleville
Registrant State/Province: EX
Registrant Postal Code: 1234
Registrant Country: EX

Name Server: ns1.example.com
Name Server: ns2.example.com

DNSSEC: unsigned

Unless ICANN objects, the WHOIS server (port 43 and 443) and an EPP Domain:info query will also display the
following values - after display of the values required in the EPP RFC's and in Specification 4 Section 1.4.

Activation Expiry Date: 2011-12-31T11:11:11Z
Contact Confirmation Expiry Date: 2011-12-31T11:11:11Z
Registration Grace Expiry Date: 2011-12-31T11:11:11Z
Registration MIN Expiry Date: 2011-12-31T11:11:11Z

27.1.1  Contractual Considerations:

Under the .persiangulf TLD policy all registrations are considered provisional by Asia Green IT System
Bilgisayar San. ve Tic. Ltd. Sti. until the Registrant accepts the .persiangulf RA and confirms the accuracy of
the contact details lodged by the Registrar.

27.1.2  Behavior:

Until such time as the domain is Activated it is parked on a Asia Green IT System Bilgisayar San. ve Tic. Ltd.
Sti. controlled website that displays the domains port 43 WHOIS information. The SRS ignores the registrar-
submitted Name Server ("NS") delegation information for all domains with a status of "Pending Activation" and
replaces them with the CoCCA parking servers.

27.1.3  Duration:

A provisional application may be Activated by the Registrant or Administrative Contact at any time during the
first 28 days after the Registration request is lodged in the SRS. On the 29th day after registration if a
domain has not already been deleted by the Registrar, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.
deems the application to have been withdrawn by the registrant and the Status is changed to "Pending Purge "
Restore Not Possible".
```

```
 (?xml version="1.0" encoding="UTF-8" standalone="no"?)
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
   (response)
     (result code="2303")
       (msg) Object does not exist (/msg)
     (/result)
     (trID)
       (clTRID) TR-2 (/clTRID)
       (svTRID) 1333583795929 (/svTRID)
     (/trID)
   (/response)
 (/epp)
```

EPP domain:check Status

```
 (?xml version="1.0" encoding="UTF-8" standalone="no"?)
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
   (response)
     (result code="1000")
       (msg) Command completed successfully (/msg)
     (/result)  (msgQ count="309" id="21153"/)
     (resData)
       (domain:chkData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
```

```
        (domain:cd)
          (domain:name avail="0") purge.example (/domain:name)
          (domain:reason) The domain exists (/domain:reason)
        (/domain:cd)
        (/domain:chkData)
      (/resData)
      (trID)
        (clTRID) 1333584255405 (/clTRID)
        (svTRID) 1333584255410 (/svTRID)
      (/trID)
    (/response)
(/epp)
```

WHOIS Status Display (Domain Status: Excluded - Pending Purge). The Registrant and their Registrar are sent an email and EPP Polling message indicating the Status change.

On the 31st day after Registration, a domain that has not been Activated is purged from the SRS and instantly available for registration. Registrars are sent a polling message and email informing them that the domain application has been rejected and the domain has been deleted.

27.1.4 Commercial Considerations:

Funds are debited from the Registrars account instantly and refunded in full after 31 days if a domain is not activated and where Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has deemed the application to register to have been withdrawn. Names that are not Activated are not delegated in accordance with the Registrants wishes and cannot be used for tasting.

27.2 Registered Activated
Once Activated the EPP Domain:info Status is automatically changed to "Active - Delegated" and the WHOIS display to "Active - Delegated".

Unless ICANN objects, the WHOIS server (port 43 and 443) and EPP Domain:info query will also display the following values - after display of the values required in the EPP RFC's and in Specification 4 Section 1.4.

) Activation Date: 2011-12-31T11:11:11Z
) Contact Confirmation Date: 2011-12-31T11:11:11Z
) Registration Grace Expiry Date: [Activation Date: 2011-12-31T11:11:11Z]
Note : [Grace Period expires as soon as a name is activated]
) Registration MIN Expiry Date: 2011-12-31

27.3 Registration Grace
A one (1) day Grace period applies to all registrations, Provisional (pending activation) registrations. If a name is Activated the Grace Period is instantly expired. This policy effectively mitigates the prospect of abuse of the .persiangulf TLD or CoCCA's SRS for domain tasting, kiting or other similar activity, while allowing a registrar 24 hours to reverse a registration that included a typographical error or was found to be fraudulent without incurring a commercial penalty.

EPP domain:info Status

```
("xml version="1.0" encoding="UTF-8" standalone="no"")
(epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
  (response)
    (result code="1000")
      (msg) Command completed successfully (/msg)
    (/result)
    (msgQ count="309" id="21153"/)
    (resData)
      (domain:infData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
        (domain:name) pending.example (/domain:name)
        (domain:roid) 1234-CoCCA (/domain:roid)
        (domain:status s="inactive") Delegation information has not been supplied (/domain:status)
        (domain:registrant) example (/domain:registrant)
        (domain:clID) adam (/domain:clID)
        (domain:crID) adam (/domain:crID)
        (domain:crDate) 2012-04-02T03:39:55.925Z (/domain:crDate)
        (domain:exDate) 2013-04-02T03:39:55.942Z (/domain:exDate)
        (domain:authInfo)
          (domain:pw) example (/domain:pw)
        (/domain:authInfo)
      (/domain:infData)
    (/resData)
    (extension)
      (rgp:infData xmlns:rgp="urn:ietf:params:xml:ns:rgp-1.0" xsi:schemaLocation="urn:ietf:params:xml:ns:rgp-1.0
rgp-1.0.xsd")
        (rgp:rgpStatus s="addPeriod"/)
      (/rgp:infData)
    (/extension)
    (trID)
      (clTRID) TR-2 (/clTRID)
      (svTRID) 1333581885177 (/svTRID)
    (/trID)
```

```
   (/response)
 (/epp)
```

WHOIS Status Display

Unless ICANN objects, the WHOIS server (port 43 and 443) and EPP Domain:info query will also display the following values - after display of the values required in the EPP RFC's and in Specification 4 Section 1.4.

) Activation Expiry Date: 2011-12-31T11:11:11Z
) Contact Confirmation Expiry Date: 2011-12-31T11:11:11Z
) Registration Grace Expiry Date: 2011-12-31T11:11:11Z
) Registration MIN Expiry Date: 2011-12-31T11:11:11Z

27.3.1 Registration Grace | Behavior
Domains deleted during Grace do NOT go into redemption and are instantly available. Domains may NOT be transferred during GRACE. The Domain Status shown in a WHOIS and EPP query during grace is "clientTransferProhibited".

27.3.2 Registration Grace |Commercial Considerations
A full refund equal to 100% of the registration value is applied to a registrars account for domains that are not activated in the first 24 hours. If a domain is Activated in the first 24 hours then deleted it is considered to have been deleted during the "MIN" period as Grace expires on Activation. See Section 28 bellow for explanation of "MIN".

27.4 MIN Period
The MIN period is a life-cycle element that is probably unique to the CoCCA SRS - and mostly commercial in nature. The MIN period for the .persiangulf is 14 days, the MIN period starts when a name is registered.

Unless ICANN objects, the WHOIS server (port 43 and 443) and EPP Domain:info query will also display the following value - after display of the values required in the EPP RFC's and in Specification 4 Section 1.4.

) Registration MIN Expiry Date: 2011-12-31T11:11:11Z

27.4.1 Registration MIN | Behavior
Domains deleted by a registrar during the MIN period do NOT go into redemption. Domains may not be transferred during MIN. (the Domain Status shown in a WHOIS and EPP query is "clientTransferProhibited"). An EPP polling message is sent when the MIN period expires.

27.4.2 Registration MIN | Commercial Considerations
Since the Grace period is only one day - and only for domains that are not activated, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will give registrars a partial refund (80% of the annual registration fee) for Activated names that are deleted in the first 14 days after registration.

27.5 Renewals
Under the .persiangulf TLD RA registrants are required to confirm the accuracy of the contact details and accept the .persiangulf TLD RA, AUP and Privacy Policy with the registry within 28 days of renewal or the domain is suspended until such time as the RA is accepted and contact details confirmed.

27.6 Expiry
The SRS supports "registrar configurable auto renew", registrars may custom configure the auto-renew behavior via CoCCA's GUI. Some registrars may wish to auto renew domains on expiry while others may not. If a registrar has configured auto renew the SRS, and they have available credit, the SRS will renew the domain for the period selected by the registrar (up to the maximum allowable) on the day it expires. If a name expires the following would apply.

Unless ICANN objects, the SRS will automatically update the domain record so that a query of the WHOIS server (port 43 and 443) or EPP Domain:info query will also display the following value - after display of the values required in the EPP RFC's and in Specification 4 Section 1.4.

) Contact Confirmation Expiry Date: 2011-12-31T11:11:11Z
) Renewal Grace Expiry Date: 2011-12-31:T11:11:Z

27.6.1 Expiry Grace | Suspension
On Expiry a domain automatically enters a seven day Expiry Grace period in which the domain is Suspended by the SRS and parked on a Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. parking page.

```
 ("xml version="1.0" encoding="UTF-8" standalone="no"")
 (epp xmlns="urn:ietf:params:xml:ns:epp-1.0" xmlns:xsi="http:/-/www.w3.org/2001/XMLSchema-instance"
xsi:schemaLocation="urn:ietf:params:xml:ns:epp-1.0 epp-1.0.xsd")
   (response)
     (result code="1000")
       (msg) Command completed successfully (/msg)
     (/result)
     (msgQ count="354" id="21153"/)
     (resData)
       (domain:infData xmlns:domain="urn:ietf:params:xml:ns:domain-1.0"
xsi:schemaLocation="urn:ietf:params:xml:ns:domain-1.0 domain-1.0.xsd")
         (domain:name) suspended-expired.example (/domain:name)
         (domain:roid) 1234-CoCCA (/domain:roid)
         (domain:status s='serverHold") Suspended automatically (/domain:status)
         (domain:registrant) MI8JPiQP (/domain:registrant)
         (domain:ns)
           (domain:hostObj) ns2.example (/domain:hostObj)
```

```
          (domain:hostObj) ns1.example (/domain:hostObj)
        (/domain:ns)
        (domain:clID) example (/domain:clID)
        (domain:crID) example (/domain:crID)
        (domain:crDate) 2009-05-17T21:49:34.649Z (/domain:crDate)
        (domain:upID) example (/domain:upID)
        (domain:upDate) 2012-04-05T01:38:12.649Z (/domain:upDate)
        (domain:exDate) 2011-11-17T20:49:34.644Z (/domain:exDate)
        (domain:trDate) 2009-05-17T21:49:34.728Z (/domain:trDate)
        (domain:authInfo)
          (domain:pw) example (/domain:pw)
        (/domain:authInfo)
      (/domain:infData)
    (/resData)
    (extension)
    (/extension)
    (trID)
      (clTRID) TR-2 (/clTRID)
      (svTRID) 1333590323304 (/svTRID)
    (/trID)
  (/response)
(/epp)
```

An expired and suspended name is not locked and may be renewed without a restore fee in the first seven (7) days after expiration. Suspended domains may NOT be transferred.

27.6.2 Expiry | Pending Delete - Restorable (Redemption)

On the eighth day after expiration the SRS will change the domain's Status to "Pending Delete Restorable" for a period of 28 days. Suspended and Pending Delete domains may NOT be transferred. At any point between after day seven (7) and before day 29 a registrar may Restore a domain via EPP (RFC-3915) after restoration a domain must be renewed.

The SRS will automatically update the domain record so that a query of the WHOIS or EPP will also display the following values.

) Redemption Expiry Date: 2011-12-31
) Purge Date: 2011-12-31

27.6.3 Expiry | Pending Purge (No longer Restorable)

On the 29th day after expiry the SRS will change the status of the domain to "Pending - Purge" and apply a registry lock. The WHOIS status and EPP Domain:info query would be displayed as Pending Purge. The domain would stay in this state for seven (7) days until purged from the SRS 35 days after Expiry. Once purged it is available - subject to any restrictions or polices in effect at the time.

See Attached Life - Cycle Diagram

---

28. Abuse Prevention and Mitigation: Applicants should describe the proposed policies and procedures to minimize abusive registrations and other activities that have a negative impact on Internet users. A complete answer should include, but is not limited to:

- An implementation plan to establish and publish on its website a single abuse point of contact responsible for addressing matters requiring expedited attention and providing a timely response to abuse complaints concerning all names registered in the TLD through all registrars of record, including those involving a reseller;
- Policies for handling complaints regarding abuse;
- Proposed measures for removal of orphan glue records for names removed from the zone when provided with evidence in written form that the glue is present in connection with malicious conduct (see Specification 6); and
- Resourcing plans for the initial implementation of, and ongoing maintenance for, this aspect of the criteria (number and description of personnel roles allocated to this area).

To be eligible for a score of 2, answers must include measures to promote Whois accuracy as well as measures from one other area as described below.

- Measures to promote Whois accuracy (can be undertaken by the registry directly or by registrars via requirements in the Registry-Registrar Agreement (RRA)) may include, but are not limited to:
  - Authentication of registrant information as complete and accurate at time of registration. Measures to accomplish this could include performing background checks, verifying all contact information of principals mentioned in registration data, reviewing proof of establishment documentation, and other means
  - Regular monitoring of registration data for accuracy and completeness, employing authentication methods, and establishing policies and procedures to address domain names with inaccurate or incomplete Whois data; and
  - If relying on registrars to enforce measures, establishing policies and procedures to ensure compliance, which may include audits, financial incentives, penalties, or other means. Note that the requirements of the RAA will continue to apply to all ICANN-accredited registrars.
- A description of policies and procedures that define malicious or abusive behavior, capture metrics, and establish Service Level Requirements for resolution, including service levels for responding to law enforcement requests. This may include rapid takedown or suspension systems and sharing information regarding malicious or abusive behavior with industry partners;
- Adequate controls to ensure proper access to domain functions (can be undertaken by the registry directly or by registrars via requirements in the Registry-Registrar Agreement (RRA)) may include, but are not limited to:
  - Requiring multi-factor authentication (i.e., strong passwords, tokens, one-time passwords) from registrants to process update, transfers, and deletion requests;
  - Requiring multiple, unique points of contact to request and/or approve update, transfer, and deletion requests; and
  - Requiring the notification of multiple, unique points of contact when a domain has been updated, transferred, or deleted.

A complete answer is expected to be no more than 20 pages.

28.1 Policy Matrix
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has chosen to adopt CoCCA"s tested acceptable use-based policy matrix, recommendations for minimising harm in TLDs, and subject the .persiangulf TLD to the CoCCA Complaint Resolution Service ("CRS"). Any individual who has a concern regarding abuse involving a .persiangulf domain, glue record, or the CoCCA PCH or ISC"s network services as they relate to .persiangulf needs to lodge a complaint via the CRS. CoCCA's policy regarding glue records is quite simple, Registrars cannot create or use a host if the super-ordinate domain does not exist. When a domain is purged from the SRS CoCCA automatically deletes any glue records. All other glue record related issues can be dealt with via the CRS.

The CoCCA Best practice policy matrix has been developed over a decade and has currently been adopted by 16 TLDs. It was developed for (and by) ccTLDs managers that desired to operate an efficient standards-based SRS system complemented by a policy environment that addressed a registrants use of a string as well as the more traditional gTLD emphasis rights to string.

A key element of CoCCA's policy matrix is that it provides for registry-level suspensions where there is evidence of AUP violations. The .persiangulf TLD will join other TLDs that utilize the CoCCA's single-desk CRS. The CRS provides a framework for the public, law enforcement, regulatory bodies and intellectual property owners to swiftly address concerns regarding the use of .persiangulf domains, and the COCCA network. The AUP can be used to address concerns regarding a domain or any other resource record that appears in the .persiangulf zone.

The CRS procedure provides an effective alternative to the court system while allowing for Complaints against domains to be handled in a way treats each complaint in a fair and equal manor and allows for all affected parties to present evidence and arguments in a constructive forum.

In certain cases, it may be necessary for the CRS to trigger a Critical Issue Suspension, which suspends service of a domain, or removes a host record, when there is a compelling and demonstrable threat to the stability of the Internet, critical infrastructure or public safety. The intent of any CIS is to minimize any abuse that may occur in a timely manor. Any CIS may be appealed through the CoCCA ombudsman's Amicable Complaint Resolution service.
28.1 Contractual Framework
Under the proposed framework Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will bind registrants to a .persiangulf TLD Registrant Agreement ("RA"). This RA is a collateral agreement that supersedes any Registrar - Registrant agreement and binds all Registrants to the .persiangulf AUP, Privacy and WHOIS policy, CoCCA CRS and any other requirements or dispute mechanisms mandated by ICANN.

The draft .persiangulf AUP follows below in sections 28.4. The RA and WHOIS and Privacy Policy may be viewed at http://coccaregistry.net/.persiangulf/policy
28.2 Minimizing Harm, Pro-active Measures
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will adopt the following five (5) key provisions of CoCCA's already field - tested policies and technology aimed at preventing and mitigating abuse.
28.2.1 "Trust but Verify"
Applicants for .persiangulf registrations must confirm to the registry that they agree to be bound by the registrant agreement and confirm the accuracy of contact details lodged by the Registrar with the registry. Until the Registrant or Administrative contact confirm their contact details with the Registry directly, and view accept the Registrant Agreement .persiangulf domains are excluded from the zone. See Life-Cycle Policy.

Automated Activation processes are already in place for 12 TLD currently using the CoCCA SRS. The process involves direct registry - registrant communication using email details provided to the registry by the Registrar. An automated email is sent to the Registrant and Admin contact that contains a link. The recipient must click on the link where they are directed to a web page that 1) displays the contact information the Registrar provided, 2) displays the .persiangulf RA and AUP policy.

All responses (positive or negative) are lodged against the domains permanent history in the SRS and the time: date / IP address stored.

The process also allows the registry the opportunity to independently verify the accuracy of contact data supplied by the registrar, or at least that there is a functioning email - improving WHOIS accuracy. The SRS uses dynamically generated images as a challenge-response verification to prevent automated processes activating domains and to directly collect and store additional identifying information about individuals Activating a domain, which can be utilised to control fraud or investigate cyber crimes.

Although registrars are required to advise registrants of the TLD policies and conditions, with the prevalence of highly automated registration systems and expansive reseller networks it cannot be guaranteed that registrants have reviewed or agreed to the policy.

The registrant or administrative contact must confirm the accuracy of the WHOIS data on not only on Registration but also the anniversary of Registration and Renewal. On any change of Registrant or Transfer the new Registrant must also agree to the RA and AUP directly with the Registry before the changes to the contacts are committed in the registry.

These procedures and the underlying technology are in use now and undergoing constant refinement in response to Registrar and Registrant suggestions.
28.2.2 Registrants' rights to a limited license
The .persiangulf RA and AUP limit a registrants' rights to a limited license to use but not to sub-license the use of any portion of the allocated SLD, subject to continuing compliance with all policies in place during that time. Registrants must warrant they will not assign the licence or sub-license any sub-domain without:

(a) securing the sub-licensee's agreement to the RA, AUP and all other applicable policies; and
(b) obtaining the registry's consent in writing.

Rationale: It has occurred that registrants have registered a second level domain in order to set up what amounts to a third level registry, effectively sub-licensing to third parties the use of portions of their

allocated second level domain. Most abuse seems to occur in lower level domains created by Registrants or third parties.

The .persiangulf TLD policy is recursive, however combating abusive activity in a TLD is complicated if the registry has no information as to the user of the subordinate domain or any way to suspend a single domain created by a registrant at a subordinate level.

28.2.3 Fast flux mitigation

Fast flux mitigation - queue for manual intervention by SRS admins all DNS delegation modifications that exceed four (4) requests in any 28 day period or three (3) in a one week period.

Rationale: This minimizes a registrant's ability to frequently redelegate a domain, in order to overcome service limitations imposed by Internet service providers. Frequent redelegation may also assist a malicious user to obscure their identity. Limiting frequent redelegations enhances the effectiveness of service termination as a sanction by an Internet service provider.

28.2.4 Anycast Resiliency

A denial of service attack from, say, a single ISP will usually only affect a single node. All other nodes in the world will not notice anything about the attack and the rest of the Internet will thus not notice it either. A local attack is therefore only affecting the local neighborhood. Distributed denial of service attacks usually affects a few nodes only, but because the attack is spread out between nodes, so is the amount of traffic flowing to each node. With 80+ noes and two Anycast networks, the .persiangulf TLD is well protected against abuse targeting the .persiangulf DNS resolvers.

28.2.5 High Risk Strings

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will require manual intervention by the registry operator before domains that contain various strings such as "bank", "secure", "PayPal" etc., go into the zone. A comprehensive list of high-risk strings

28.2.6 Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. CERT Law Enforcement Collaboration

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will provide CERT, Law Enforcement and other interested parties direct read - only Access to the SRS on application for research and other activities related to identifying and mitigating abuse. The CoCCA already provides direct access to the Australian Government CERT.

The CoCCA SRS contains a variety of login types with various permissions, one such type is "Cert / Law Enforcement" which allows GUI - based query as well as EPP and Zone Access.

28.3 COCCA Complaint Resolution Service

The Complaint Resolution Service ("CRS") provides a transparent, efficient and cost effective way for the public, law enforcement, regulatory bodies and intellectual property owners to have their concerns addressed regarding use of a TLD managers network or SRS services. The CRS provides a single framework in which cyber-crime, accessibility of prohibited Internet content and abuse of intellectual property rights are addressed. The framework relies on three tiers of review: immediate action to protect the public interest, amicable complaint resolution lead by an independent Ombudsman, and where applicable, adjudication by an Expert. The CRS provides an efficient and swift alternative to the Courts.

All complaints made against a domain to CoCCA are referred through the CRS protocol. When a complaint is filed, a CoCCA Complaints Officer (CCO) ensures that it meets the necessary criteria. If it does, notice is sent to involved parties and CRS Proceedings begin. If a Registrant responds to the complaint, it may be referred to an Ombudsman for Amicable Complaint Resolution (ACR). If ACR does not achieve acceptable resolution, binding arbitration by an Expert be requested by the Complainant.

In some cases, a Critical Issue Suspension (CIS) may become necessary. If a CIS has been determined to be necessary, the domain, or other resource record in a zone will be disabled until a resolution is found using the CRS protocol. A CIS is triggered in cases where there is a compelling and demonstrable threat to the stability of the Internet, critical infrastructure or public safety. A CIS does not terminate the license to a domain, and cannot be used to trigger the transfer a domain - it simply suspends resolution.

CRS Overview Diagram - cocca-crs1.pdf

28.4 .PERSIANGULF Acceptable Use Policy

This Acceptable Use Policy ("AUP") sets out the actions prohibited to users of the Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. (AGITSys) ("applicant") network. "Users" are defined as anyone who uses or accesses the .PERSIANGULF domain SRS, who has responsibility for one or more host records in the .PERSIANGULF zone files generated from the .PERSIANGULF SRS, registrants of a .PERSIANGULF Top Level ("TLD") Domain name (".PERSIANGULF Domain name"), and/or users of hardware, name servers, bandwidth, telecommunications transport, zone files or e-mail routing services or of any other domain name resolution systems and services in the .PERSIANGULF SRS and zone. Exceptions for use will be made for sites that denigrate the Persian Language, Culture and History.

This AUP policy applies recursively to all Domain names (which end in the suffix .PERSIANGULF), including second-level .PERSIANGULF Domain names (such as (nic.PERSIANGULF)) and sub second-level domains (such as (example.nic.PERSIANGULF)) which are maintained in the authoritative .PERSIANGULF register (managed by AGITSys); and those that are created outside the AGITSys TLD register and resolve as a result of sub-delegation by a Registrant.

No reference in this document constitutes a license to sub-delegate or otherwise sub-license any right obtained under the .PERSIANGULF Registrant Agreement, this AUP or other applicable .PERSIANGULF TLD Policies.

This AUP is in addition to rules governing qualifications for registration. Use of a .PERSIANGULF Domain name or the AGITSys Network in a manner that contravenes this AUP, may result in the suspension or revocation of a registrant's right to use a .PERSIANGULF Domain name or to continue to be recognized as the registrant of a .PERSIANGULF Domain name. Suspension or revocation may apply to one or more .PERSIANGULF Domain names for which User is a registrant in addition to a particular .PERSIANGULF Domain name which may have given rise to a particular complaint.

AGITSys reserves the right to modify or update this AUP at any time and any such modifications or restatements shall be posted on AGITSys' website at http://registry.PERSIANGUF/legal/aup.htm from time to time. AGITSys will use reasonable commercial efforts to inform designated contacts in the event of changes to this AUP. Such efforts may include posting the revised AUP on AGITSys' website and/or sending email notice that this AUP has been modified or updated.

INTRODUCTION
AGITSys supports the free flow of information and ideas over the Internet.
AGITSys may discontinue, suspend, or modify the services provided to the registrant of an .PERSIANGULF Domain name (for example, through modification of .PERSIANGULF zone files), to address alleged violations of this AUP (described further below). AGITSys may determine in its sole discretion whether use of the AGITSys network or a .PERSIANGULF Domain name is prima facie violation of this AUP. AGITSys or affected parties may utilize the AGITSys AUP CRS and/or the courts in the jurisdiction and venue specified in the Registrant Agreement to resolve disputes over interpretation and implementation of this AUP, as described more fully in the AGITSys AUP CRS. Users of the AGITSys Network are obliged and required to ensure that their use of a .PERSIANGULF Domain name or the AGITSys Network is at all times lawful and in accordance with the requirements of this AUP and applicable laws and regulations of Turkey.
This AUP should be read in conjunction with the AGITSys Registrant Agreement, Complaint Resolution Policy, Privacy Policy, Acceptable Use Policy, and other applicable agreements, policies, laws and regulations. By way of example, and without limitation, the Registrant Agreement sets forth representations and warranties and other terms and conditions, breach of which may constitute non-compliance with this AUP.
PROHIBITED USE
A "Prohibited use" of the AGITSys Network or a .PERSIANGULF Domain name is a use which is expressly prohibited by provisions of this AUP. The non-exhaustive list of restrictions pertaining to use of the AGITSys Network and .PERSIANGULF Domain names in relation to various purposes and activities are as follows. Registration of one or more .PERSIANGULF Domain names or access to services provided by AGITSys may be cancelled or suspended for any breach of, or non-compliance with this AUP:
1. COMPLIANCE WITH AGITSys AUP
1.1 The AGITSys Network and .PERSIANGULF Domain names must be used for lawful purposes and comply with this AUP. The creation, transmission, distribution, storage of, or linking to any material in violation of applicable law or regulation or this AUP is prohibited. This may include, but is not limited to, the following:
(1.1) Communication, publication or distribution of material (including through links or framing) that infringes upon the intellectual and/or industrial property rights of another person. Intellectual and/or industrial property rights include, but are not limited to: copyrights (including future copyright), design rights, patents, patent applications, trademarks, rights of personality, and trade secret information.
(1.2) Communication, publication or distribution of material (including through links or framing) that denigrates the Persian Language, Culture and History.
(1.3) Registration or use of a .PERSIANGULF Domain name in circumstances in which, in the sole discretion of the AGITSys:
(1.3.a) The .PERSIANGULF Domain name is identical or confusingly similar to a personal name, company, business or other legal or trading name as registered with the relevant Turkish agency, or a trade or service mark in which a third party complainant has uncontested rights, including without limitation in circumstances in which:
(1.3.a.i) The use deceives or confuses others in relation to goods or services for which a trade mark is registered in Turkey, or in respect of similar goods or closely related services, against the wishes of the registered proprietor of the trade mark; or
(1.3.a.ii) The use deceives or confuses others in relation to goods or services in respect of which an unregistered trade mark or service mark has become distinctive of the goods or services of a third party complainant, and in which the third party complainant has established a sufficient reputation in Turkey, against the wishes of the third party complainant; or
(1.3.a.iii) The use trades on or passes-off a .PERSIANGULF Domain name or a website or other content or services accessed through resolution of a .PERSIANGULF Domain as being the same as or endorsed, authorized, associated or affiliated with the established business, name or reputation of another; or
(1.3.a.iv) The use constitutes intentionally misleading or deceptive conduct in breach of AGITSys policy, or the laws of Turkey; or
(1.3.b) The .PERSIANGULF Domain name has been used in bad faith, including without limitation the following:
(1.3.b.i) The User has used the .PERSIANGULF Domain name primarily for the purpose of unlawfully disrupting the business or activities of another person; or
(1.3.b.ii) By using the .PERSIANGULF Domain name, the User has intentionally created a likelihood of confusion with respect to the third party complainant's intellectual or industrial property rights and the source, sponsorship, affiliation, or endorsement of website(s), email, or other online locations or services or of a product or service available on or through resolution of a .PERSIANGULF Domain name;
(1.3.b.iii) For the purpose of selling, renting or otherwise transferring the Domain name to an entity or to a commercial competitor of an entity, for valuable consideration in excess of a User's documented out-of-pocket costs directly associated with acquiring the Domain Name;
(1.3.b.iv) As a blocking registration against a name or mark in which a third party has superior intellectual or industrial property rights.
(1.4) A .PERSIANGULF Domain name registration which is part of a pattern of registrations where the User has registered domain names which correspond to well-known names or trademarks in which the User has no apparent rights, and the .PERSIANGULF Domain name is part of that pattern;
(1.5) The .PERSIANGULF Domain name was registered arising out of a relationship between two parties, and it was mutually agreed, as evidenced in writing, that the Registrant would be an entity other than that currently in the register.
(1.6) Unlawful communication, publication or distribution of registered and unregistered know-how, confidential information and trade secrets.
(1.7) Publication or distribution of content which, in the opinion of the AGITSys:
(1.7.a) is capable of disruption of systems in use by other Internet users or service providers (e.g. viruses or malware);
(1.7.b) seeks or apparently seeks authentication or login details used by operators of other Internet sites (e.g. phishing); or
(1.7.c) may mislead or deceive visitors to the site that the site has an affiliation with the operator of another Internet site (e.g. phishing).
(1.8) Communication, publication or distribution, either directly or by way of embedded links, of images or materials (including, but not limited to pornographic material and images or materials that a reasonable person as a member of the community of Turkey would consider to be obscene or indecent) where such communication, publication or distribution is prohibited by or constitutes an offence under the laws of Turkey, whether incorporated directly into or linked from a web site, email, posting to a news group, internet forum, instant messaging notice which makes use of domain name resolution services in the .PERSIANGULF TLD.
Material that a reasonable member of the community of Turkey would consider pornographic, indecent, and/or obscene or which is otherwise prohibited includes, by way of example and without limitation, real or manipulated

images depicting child pornography, bestiality, excessively violent or sexually violent material, sexual activity, and material containing detailed instructions regarding how to commit a crime, an act of violence, or how to prepare and/or use illegal drugs
(1.9) Communication, publication or distribution of defamatory material or material that constitutes racial vilification.
(1.10) Communication, publication or distribution of material that constitutes an illegal threat or encourages conduct that may constitute a criminal offence.
(1.11) Communication, publication or distribution of material that is in contempt of the orders of a court or another authoritative government actor within Turkey.
(1.12) Use, communication, publication or distribution of software, technical information or other data that violates Turkey's export control laws.
(1.13) Use, communication, publication or distribution of confidential or personal information or data including confidential or personal information about persons that collected without their knowledge or consent.
2. ELECTRONIC MAIL
2.1 AGITSys expressly prohibits Users of the AGITSys Network from engaging in the following activities:
(1.1) Communicating, transmitting or sending unsolicited bulk e-mail messages or other electronic communications ("junk mail" or "Spam") of any kind including, but not limited to, unsolicited commercial advertising, informational announcements, and political or religious tracts. Such messages or material may be sent only to those who have expressly requested it. If a recipient asks a User to stop sending such e-mails, then any further e-mail messages or other electronic communications would in such event constitute Spam and violate the provisions and requirements of this AUP.
(1.2) Communicating, transmitting or sending any material by e-mail or otherwise that harasses, or has the effect of harassing, another person or that threatens or encourages bodily harm or destruction of property including, but not limited to, malicious e-mail and flooding a User, site, or server with very large or numerous pieces of e-mail or illegitimate service requests.
(1.3) Communicating, transmitting, sending, creating, or forwarding fraudulent offers to sell or buy products, unsolicited offers of employment, messages about "Make-Money Fast", "Pyramid" or "Ponzi" type schemes or similar schemes, and "chain letters" whether or not the recipient wishes to receive such messages.
(1.4) Adding, removing, modifying or forging AGITSys Network or other network header information with the effect of misleading or deceiving another person or attempting to impersonate another person by using forged headers or other identifying information ("Spoofing").
(1.5) Causing or permitting the advertisement of a .PERSIANGULF Domain name in an unsolicited email communication.
3. DISRUPTION OF AGITSys NETWORK
3.1 No-one may use the AGITSys Network or a .PERSIANGULF Domain name for the purpose of:
(1.1) Restricting or inhibiting any person in their use or enjoyment of the AGITSys Network or a .PERSIANGULF Domain name or any service or product of AGITSys.
(1.2) Actually or purportedly reselling AGITSys services and products without the prior written consent of AGITSys.
(1.3) Transmitting any communications or activity, which may involve deceptive marketing practices such as the fraudulent offering of products, items, or services to any other party.
(1.4) Providing false or misleading information to AGITSys or to any other party through the AGITSys Network.
(1.5) Facilitating or aiding the transmission of confidential information, private, or stolen data such as credit card information (without the owner's or cardholder's consent).
4. NETWORK INTEGRITY AND SECURITY
4.1 Users are prohibited from circumventing or attempting to circumvent the security of any host, network or accounts ("cracking" or "hacking") on, related to, or accessed through the AGITSys Network. This includes, but is not limited to:
(1.1) accessing data not intended for such user;
(1.2) logging into a server or account which such user is not expressly authorized to access;
(1.3) using, attempting to use, or attempting to ascertain a username or password without the express written consent of the operator of the service in relation to which the username or password is intended to function;
(1.4) probing the security of other networks;
(1.5) executing any form of network monitoring which is likely to intercept data not intended for such user.
4.2 Users are prohibited from effecting any network security breach or disruption of any Internet communications including, but not limited to:
(2.1) accessing data of which such User is not an intended recipient; or
(2.2) logging onto a server or account, which such User is not expressly authorized to access.
For the purposes of this section 4.2, "disruption" includes, but is not limited to:
port scans, TCP/UDP floods, packet spoofing;
forged routing information;
deliberate attempts to overload or disrupt a service or host;
using the AGITSys Network in connection with the use of any program, script, command, or sending messages with the intention or likelihood of interfering with another user's terminal session by any means, locally or by the Internet.
4.3 Users who compromise or disrupt AGITSys Network systems or security may incur criminal or civil liability. AGITSys will investigate any such incidents and will cooperate with law enforcement agencies if a crime is suspected to have taken place.
5. NON-EXCLUSIVE, NON-EXHAUSTIVE
This AUP is intended to provide guidance as to what constitutes acceptable use of the AGITSys Network and of .PERSIANGULF Domain names. However, the AUP is neither exhaustive nor exclusive.
6. COMPLAINTS
Persons who wish to notify AGITSys of abusive conduct in violation of this AUP may report the same pursuant to the AGITSys Acceptable Use Policy Enforcement Procedure, which is instituted by submitting to AGITSys a completed AGITSys Acceptable Use Policy Violation Complaint Form.
7. ENFORCEMENT
AGITSys may, in its sole discretion, suspend or terminate a User's service for violation of any of the requirements or provisions of the AUP on receipt of a complaint if AGITSys believes:
(1.1.a) a violation of the AUP has or may have occurred; or
(1.1.b) suspension and/or termination may be in the public interest.
AGITSys may delegate its right to take any action to an Internet security agency or may act upon any report from an Internet security agency without prior notification to the User.
If AGITSys elects not to take immediate action, AGITSys may require Registrants and a complainant to utilise the

AUP Complaint Resolution Service and Policy to ensure compliance with this AUP and remedy any violation or suspected violation within a reasonable time prior to suspension or terminating service.
8. LIMITATION OF LIABILITY
In no event shall AGITSys be liable to any User of the AGITSys Network, any customer, nor any third party for any direct, indirect, special or consequential damages for actions taken pursuant to this AUP, including, but not limited to, any lost profits, business interruption, loss of programs or other data, or otherwise, even if AGITSys was advised of the possibility of such damages. AGITSys' liability for any breach of a condition or warranty implied by the Registrant Agreement or this AUP shall be limited to the maximum extent possible to one of the following (as AGITSys may determine):
(i) supplying the services again; or
(ii) paying the cost of having the services supplied again.
9. REMOVAL OF CONTENT RESPONSIBILITY
At its sole discretion, AGITSys reserves the right to:
(i) Remove or alter content, zone file data or other material from its servers provided by any person that violates the provisions or requirements of this AUP;
(ii) re-delegate, redirect or otherwise divert traffic intended for any service;
(iii) notify operators of Internet security monitoring, virus scanning services and/or law enforcement authorities of any apparent breach of this AUP or .PERSIANGULF TLD Policies; and/or
(iv) terminate access to the AGITSys Network by any person that AGITSys determines has violated the provisions or requirements of this AUP.
In any regard, AGITSys is not responsible for the content or message of any newsgroup posting, e-mail message, or web site regardless of whether access to such content or message was facilitated by the AGITSys Network. AGITSys does not have any duty to take any action with respect to such content or message by creating this AUP, and Users of the AGITSys Network are obliged and required to ensure that their use of a .PERSIANGULF Domain name or the AGITSys Network is at all times in accordance with the requirements of this AUP and any applicable laws and/or regulation.

28.5 CoCCA CRS - Policies and Procedures

1. Statement of Purpose

1.1. This Complaint Resolution Service ("CRS") provides a transparent, efficient and cost effective way for the public, law enforcement, regulatory bodies and intellectual property owners to have their concerns addressed regarding use of a TLD Managers network or services.

1.2. The Service provides a single framework in which cyber-crime, accessibility of prohibited Internet content via a member"s network or services and abuse of intellectual property rights are addressed. The framework relies on three tiers of review: immediate action to protect the public interest, amicable complaint resolution lead by an independent Ombudsman, and where applicable, adjudication by an Expert. The CRS provides an efficient and swift alternative to the Courts.

This document should be read in conjunction with the Acceptable Use Policy ("AUP") applicable to the domain / TLD you are considering lodging a complaint against. If after having reviewed the applicable AUP Policy it is determined a violation has occurred, a complaint may be lodged by completing the CoCCA CRS Complaint form.

NOTE: IF YOU DO NOT LODGE THE SIGNED COMPLAINT FORM THAT FOLLOWS BELLOW ON PAGES 8- 13 OF THIS DOCUMENT, YOUR COMPLAINT WILL NOT BE REVIEWED.

Complaints will be reviewed in accordance with the following Steps:

Step One | Confirmation / Communication

A CoCCA Complaints Officer ("CCO") will review all formally lodged complaints for compliance with the CRS and the applicable AUP. If the CCO considers that the Complaint does not address the matter covered by the AUP, or is unsigned or otherwise violates this Procedure, the Complainant will be promptly notified of the deficiencies identified.

The Complainant shall have five (5) Days from the receipt of notification within which to correct the deficiencies and return the Complaint, failing which the CCO will deem the Complaint to be withdrawn. This will not prevent the Complainant from submitting a different Complaint.

On receipt of the Complaint the CCO will lock domain and associated records until a period of ten (10) Days after the COO and Parties are notified of a Decision by the Ombudsman or and Expert, at which time the domain name may be unlocked.

Step Two | Immediate Review of Request for Suspension in the Public Interest

On receipt of a properly lodged Complaint, the CCO will initiate a review. When specifically requested by the Complainant the CCO may initiate a Critical Issue Suspension ("CIS").

A request for a CIS may be granted in cases where there is a compelling and demonstrable threat to the stability of the Internet, critical infrastructure or public safety. A "critical issue suspension" does not terminate the registrant"s rights or their domain license; it simply modifies the NS records in the zone temporarily disabling resolution. All suspensions under the CRS, including a CIS, may be appealed to the Ombudsman"s office for amicable resolution, an Expert Panelist for binding arbitration or a court of competent jurisdiction.

Where the CCO has triggered a CIS, notice will be sent to the Registrant, Administrative Contact, Registrar and Ombudsman within 24 hours of triggering the CIS.

Step Three | Formal Notification

The CCO will send a copy of the Complaint to the Respondent (normally the Registrant and/or Administrative Contact) and the TLD Sponsors designated contact with an explanatory note within 5 days by:

a) Sending the Complaint by post, fax or e-mail to the Respondent at the contact details shown as the Registrant or any other contacts in the TLD Register for the Domain Name that is the subject of the Complaint.

b) The CCO may also, at their discretion send the complaint to any addresses provided to the CCO by the Complainant so far as this is practicable.

c) Except as set forth otherwise, all written communication to a Party or a party"s representative under the Policy or this Procedure shall be made by fax, post or e-mail.

d) Communication shall be made in English, E-mail communications (other than attachments) should be sent in plain text or PDF format so far as this is practicable.

During the course of the proceedings under the CRS, if either Party wishes to change its contact details it must notify the CCO of all changes. However, no change shall be made in the Registrant Information for the Domain Name without mutual agreement of the parties or unless a settlement is reached.
Except as otherwise provided in this Procedure or as otherwise decided by the CCO or if appointed, the Expert, all communications provided for under this procedure shall be deemed to have been received:

a) if sent by courier, when singed for by the recipient;
b) if sent via the Internet, on the date that the communication was transmitted

Unless otherwise provided in this Procedure, the time periods provided for under the Policy and this Procedure shall be calculated based on the time zone of the CCO.

Any communication between:

a) the CCO and any Party shall be copied by the CCO to the other Party and if appointed, the Ombudsman or Expert;

b) a Party to another Party shall be copied by the sender to the CCO. The CCO will copy such correspondence to the Ombudsman or Expert, if appointed.

Commencement of Complaint Resolution Service proceedings

The CCO will promptly notify the Parties by email of the date of the Commencement of Complaint Resolution Service proceedings. The date and time of transmission of such email in the time zone of the CCO according to the email header generated by the CCO"s transmitting emails system will be the date of Commencement of CRS proceedings.

The Response

Within fifteen (15) Days of the date of Commencement of Complaint Resolution Service proceedings, the Respondent may submit a Response.

The Respondent must send the Response to the CCO signed in electronic form at the addresses set out in the explanatory coversheet. In determining whether a Response was submitted in a timely manner, the date and time of receipt (as determined by the CCO"s receiving email server) shall be considered by the CCO as the date and time of submission, provided that such email i) contains a scanned copy of documents which include signatures, ii) contains all attachments, iii) is of a form and format which may be opened by the CCO. The Response

shall:

a) include any grounds that the Respondent wishes to rely upon to rebut the Complainant"s assertions;

b) specify whether the Respondent wishes to be contacted directly or through an authorized representative, and set out the e-mail address, telephone number, fax number, and postal address which should be used in communications with the Respondent;

c) disclose to the CCO whether any legal proceedings have been commenced or terminated in connection with the Domain Name(s) which is the subject of the Complaint;

d) conclude with the following statement followed by the signature of the Respondent or its authorized representative:

"The information contained in the response is to the best of the respondent"s knowledge true and complete and the matters stated in this response comply with the Policy and Procedure and applicable law."

Within (3) Days following the receipt of a signed copy of the Response, the CCO will forward the Response to the Complainant. If the Respondent does not submit a Response, the Domain will be suspended 15 days after the CRS proceedings commence.

Reply by the Complainant

Within five (5) Days of receiving the Respondent"s Response from the CCO, the Complainant may submit a Reply to the Respondent"s Response, which shall not exceed 2000 words (not including annexes). The Reply should be confined to answering any new points raised in the Response not previously dealt with in the Complaint.

Step Four | Amicable Complaint Resolution | Ombudsman

No Amicable Complaint Resolution ("ACR") will occur if the Respondent does not file a Response. Within three (3) Days of the receipt of the Complainant"s Reply (or the expiry of the deadline to do so), the CCO will arrange with the Ombudsman"s office for Amicable Complaint Resolution to be conducted. ACR will be conducted in a manner that the Ombudsman, at his or her sole discretion, considers appropriate.

Negotiations conducted between the Parties during ACR (including any information obtained from or in connection to negotiations) shall be confidential as between the Parties. Any such information will not be shown to an Expert, should one latter be appointed. Neither the Ombudsman nor any Party may reveal details of such negotiations to any third parties unless a decision-making body of competent jurisdiction orders disclosure. Neither Party shall use any information gained during mediation for any ulterior or collateral purpose or include it in any submission likely to be seen by any court or decision-making body of competent jurisdiction or an arbitral tribunal of competent jurisdiction in this Complaint or any later Complaint or litigation.

If the Parties reach a settlement during the ACR, then the existence, nature and terms of the settlement shall be confidential as between the Parties unless the Parties specifically agree otherwise, a court or decision-making body of competent jurisdiction orders otherwise, or applicable laws or regulations require it.

No binding verbal agreements can be reached as part of the ACR: any settlement reached by the Parties must be in writing to be enforceable.

If the Parties did not achieve an acceptable resolution through ACR within ten (10) Days, the Ombudsman will send notice to the Parties that the Complainant has the option to request appointment of an Expert. The Complainant will have ten (10) Days upon receipt of the notice from the Ombudsman to pay the applicable fees to CoCCA if he or she wants to move forward with binding arbitration by an Expert.

Step Five | Appointment of the Expert and Timing of Decision (Optional)

If the Ombudsman does not receive the Complainant"s request to refer the matter to an Expert together with the applicable fees within ten (10) Days, the Complaint will be deemed to have been withdrawn. This will not prevent the Complainant submitting a different Complaint.

Within five (5) Days of the receipt of the applicable fees from the Complainant, the Ombudsman will appoint an Expert on a rotational basis from a list of Experts. An Expert may only be a person named in

the CoCCA list of Experts, which the Ombudsman will maintain and publish along with the Experts" qualifications. No Expert"s appointment will be challenged on the grounds that they are insufficiently qualified. Once the Expert has been appointed, the Parties will be notified of the name of the Expert appointed and the date by which the Expert will forward, except in the case of exceptional circumstances, his or her decision to the CCO and copy the Ombudsman.

The Expert shall be both impartial and independent before accepting the appointment. During the proceedings the Expert will disclose to the Ombudsman any circumstances giving rise to the justifiable doubt as to their impartiality or independence. The Ombudsman will have the discretion to appoint a substitute Expert if necessary, in which case the timetable will be adjusted accordingly.

In addition to the Complaint, and if applicable the Response, the Reply, any appeal notice and appeal notice response, the Expert may request further statements or documents from the Parties. However, the Expert will not be obliged to consider any statements or documents from the Parties which he or she has not received according to the Policy or this Procedure or which he or she has not requested. The Expert may request a further statement that will be limited to a defined topic but will not be obliged to consider any material beyond that requested.

Step Six | Expert Decision

The Expert will decide a Complaint on the basis of the Policy, the Procedure and the submissions made by the Party. If, in the absence of exceptional circumstances, a Party does not comply with any provision in the Policy, Procedure or any request by the Ombudsman or the Expert, the Expert may draw such inferences from the Party"s non-compliance, as he or she deems appropriate.

Unless exceptional circumstances apply, an Expert shall forward his or her Decision to the Ombudsman within ten (10) Days of his or her appointment. The Decision shall be in writing and signed by the Expert. It will provide the reasons on which the decision is based, indicate the date on which it was made, the place the Decision was made and identify the name of the Expert.

Within three (3) Days of the receipt of a Decision from the Expert, the Ombudsman will communicate the full text of the Decision to each Party via email with the date for the implementation of the Decision in accordance with the Policy.

Effect of Court Proceedings

If, before or during the course of proceedings under the Complaint Resolution Service, the Ombudsman is made aware that legal proceedings have begun in or before an applicable court or decision-making body of competent jurisdiction or an arbitral tribunal of competent jurisdiction, and that such legal proceedings relate to a Domain Name which is the subject of a Complaint, he or she will suspend the Complaint Resolution Service proceedings pending the outcome of the legal proceedings.

A Party must promptly notify the Ombudsman if it initiates or becomes aware of legal proceedings in a court or decision-making body of competent jurisdiction, or arbitral tribunal of competent jurisdiction relating to a Domain Name that is the subject of a Complaint under the proceedings of the Complaint Resolution Service.

Either party may request, before or during the Complaint Resolution Service Proceedings, an interim measure of protection from a court.

Expert Fees

The applicable fees in respect of the referral of proceedings under the Complaint Resolution Service to an Expert are (in United States Dollars), for Complaints involving 1-5 Domain Names and only one Complainant, $2500 plus applicable taxes, such as goods and services taxes ("GST"). For Complaints involving 6 or more Domain Names, and / or more than one Complainant, the Ombudsman will set a fee in consultation with the Complainant. Fees are calculated on a cost-recovery basis, and are passed on in their entirety to the Expert(s). CoCCA does not charge for its mediation or administration services in respect of the Complaint Resolution Service.

Exclusion of Liability

Neither CoCCA nor its councilors, officers, members, employees or

servants nor any Expert, Mediator or any employee of any Expert or Mediator shall be liable to a Party for anything done or omitted, whether negligently or otherwise, in connection with any proceedings under the Complaint Resolution Service unless the act or omission is shown to have been in bad faith.

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29. Rights Protection Mechanisms: Applicants must describe how their registry will comply with policies and practices that minimize abusive registrations and other activities that affect the legal rights of others, such as the Uniform Domain Name Dispute Resolution Policy (UDRP), Uniform Rapid Suspension (URS) system, and Trademark Claims and Sunrise services at startup.
A complete answer should include:

- A description of how the registry operator will implement safeguards against allowing unqualified registrations (e.g., registrations made in violation of the registry's eligibility restrictions or policies), and reduce opportunities for behaviors such as phishing or pharming. At a minimum, the registry operator must offer a Sunrise period and a Trademark Claims service during the required time periods, and implement decisions rendered under the URS on an ongoing basis; and
- A description of resourcing plans for the initial implementation of, and ongoing maintenance for, this aspect of the criteria (number and description of personnel roles allocated to this area).

>To be eligible for a score of 2, answers must also include additional measures specific to rights protection, such as abusive use policies, takedown procedures, registrant pre-verification, or authentication procedures, or other covenants.
A complete answer is expected to be no more than 10 pages.

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. is fully aware of the importance of protecting the rights of others in the .persiangulf gTLD and has made rights projections a core objective. The .persiangulf TLD Rights Protection is something CoCCA has prioritized by necessity throughout its nine-year history. CoCCA currently complies with UDRP proceedings and will comply with URS proceedings as well with methods for handling Sunrise and Trademark Claims outlined below and guided by Specification requirements of the proposed Registry Agreement.

CoCCA also offers a wide range of services including, a wildcard registration program to block variants of a domain for Trademark holders as well as an "Alert" service that any interested party can subscribe to, alerting them if a specific string is registered in any CoCCA TLD. CoCCA recognizes that ICANN has not completed the Trademark Clearing House (TMCH) program. While CoCCA cannot fully describe the details of implementation for this application based on incomplete work, CoCCA intends to comply and/or exceed the final ICANN program.

In particular, CoCCA offers the following procedures to help protect the rights of trademark owners:
Sunrise Services
Trademark Claims Service
Name Selection Policy
Acceptable Use Policy
Unqualified Registration Safeguards
Wildcard Registrations / Alert services
Clearinghouse of Intellectual Property API
Thick WHOIS
RPM Compliance auditing of Registrars
UDRP, URS, PDDRP and RRDRP and CRS
Limited License
Rapid Takedown & Suspension
Malware Mitigation
Fast Flux Mitigation
Phishing Mitigation
DNSSEC Deployment
Law Enforcement and Anti-Abuse Community Collaboration
29.1 Registration Abuse Prevention Mechanisms - Pre Launch
To support Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' s objectives, CoCCA will implement specific measures in compliance with ICANN's Applicant Guide Book. At a minimum, ICANN states that Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. must offer sunrise registration for a period of thirty days during pre-launch in conjunction with the Trademark Clearing House.

CoCCA's RPM framework contains several levels of safeguards to deter unqualified registration and other malicious behaviors during pre-launch. This not only exceeds requirements, but also provides customers of the TLD predictably in service offerings and protections.

29.1.1 Sunrise & Land-rush
To meet the ICANN requirement of a 30-day Sunrise process for those with verifiable trademark rights or owners of exact matching strings in other TLDs, CoCCA shall implement for Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. a Sunrise period for domain registrations. The validations of domains names that are an identical match will occur via the Trademark Clearinghouse via notice by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. or Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' approved Registrar.
During the Sunrise, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will be responsible for determining eligibility of the registration and it will require the Registrant to affirm that they meet Sunrise Eligibility Requirements (SERs) and incorporate a Sunrise Dispute Resolution Policy (SDRP).
The Sunrise will be followed by a 30 day Registration Land-rush for members of the community/business owners/residents/etc. The process will end in General Availability or Open Registration. Eligible Trademark holders may continue to register marks on an ongoing basis.
29.1.2 Trademark Claims Service
Per ICANN's Applicant Guide Book, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. is required to provide a Trademark Claims service during pre-launch phases and for at least 60 days from the date of open registration. During the Trademark Claims period, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. or the Registrar will provide notice to the prospective registrants where an identical match is identified in the Trademark Clearinghouse. The notice will include warranties that the prospective Registrant must understand and adhere that the domain will not infringe on the rights of the respective Trademark holder. A notice will also be sent

to the designated Trademark holder of marks where an identical match has been identified.
29.1.3 Name Selection Policy
The .persiangulf TLD will enforce a name selection policy that ensures that all names registered in the gTLD will be in compliance with ICANN mandated technical standards. These include restrictions on 2 character names, tagged names, and reserved names for Registry Operations. All names must also be in compliance with all applicable RFCs governing the composition of domain names. Registrations of Country, Geographical and Territory Names will only be allowed in compliance with the restrictions as outlined in the answer to Question 22.

Additionally, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. requires that domain names within the .persiangulf TLD should consist of proper characters unique within top-level domain, followed by the characters '.persiangulf'. Domain names should meet the following technical requirements; They shall:
contain no more than 63 characters;
begin and end with a letter or a digit;
contain no characters different from letters, figures and a hyphen (allowable characters are the letters of the Roman alphabet; capital and lowercase letters do not differ);
contain no hyphens simultaneously in the third and forth positions.
Acceptable Use Policy
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has developed an Acceptable Use Policy (AUP) that is referenced in the answer to Question 28. This AUP clearly defines what type of behavior is expressly prohibited in conjunction with the use of a .persiangulf domain name. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will require, through both the Registry Registrar Agreement (RRA), and a Registry Registrant Agreement (RA) that this AUP be accepted by a registrant prior to Activation of a domain in the .persiangulf TLD. See Life-Cyle and
29.2 Rights Protection Mechanisms - Post Launch
CoCCA offers a suite of post-launch Rights Protection Mechanisms. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti., supported by CoCCA services, will promote the security and stability of the TLD with the following:
Unqualified Registration Safeguards
Wildcard Registration ⁄ Alert services
Clearinghouse of Intellectual Property API
Thick WHOIS
RPM Compliance auditing of Registrars
UDRP, URS, PDDRP and RRDRP
Limited License
Rapid Takedown & Suspension
Malware Mitigation
Fast Flux Mitigation
Phishing Mitigation
DNSSEC Deployment
Law Enforcement and Anti-Abuse Community Collaboration
29.2.1 Unqualified Registration Safeguards
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. plans to adopt the CoCCA Acceptable Use Policy (AUP) and Complaint Resolution Service Policy (CRS) as part of the operation of the .persiangulf gTLD. See 28.X

The CoCCA model differs from the "classic" gTLD shared registry system in that Registrants are bound by a collateral agreement between themselves and the TLD Operator. This collateral agreement binds them to the TLD AUP policy, WHOIS policy and Complaint Resolution Service.

Although registrars are required to advise registrants of the TLD policies and conditions, with the prevalence of highly automated registration systems and expansive reseller networks it cannot be guaranteed that registrants have reviewed or agreed to the policy. An email reiterating these policies will be sent to each registrant to ensure that new applicants are made aware of and confirm their agreement to these policies.

The same process therefore allows the registry the opportunity to verify the accuracy of customer data supplied by the registrar, use dynamically generated images as a challenge-response verification to prevent automated processes activating domains and to directly collect and store additional identifying information about registrants, which can be utilized to control fraud.
29.2.2 Wildcard Defensive Registrations
CoCCA currently supports a Wildcard option, which will extend to all new gTLDs in which a brand owner⁄ trademark holder may register a Primary domain and then can upload evidence of the trademark or other rights via PDF in the GUI.

The Registrant may then they apply online to request a *.name or other wildcard block using java regular expressions for that text string. CoCCA will manually review the request for approval, collisions with other strings etc. If approval is granted, any attempt to register any domain that triggers that string returns "not available for policy reasons" via EPP or GUI.

The domain must be kept current and up to date in order for the Wildcard Registration to be active if the Primary registration lapses, or is subject to a dispute or UDRP ruling and is transferred the Wildcard is removed.
29.2.3 Alert
Subscribers to the Premium WHOIS service may request email alerts if a domain matching a given string, or containing a specified string, is Registered.
29.2.3 Clearing House for Intellectual Property (CHIP)
CHIP is a new technology that is designed to allow trademark owners to efficiently and effectively safeguard and enforce their rights on the Internet, and in particular in the domain name space. CoCCA and IP Clearinghouse, the company that operates CHIP, have collaborated in the past to allow trademark owners to retroactively (or proactively) associate trademark information with specific domain names. This technology is available but may or may not be used depending on the outcome of developments in with gTLD clearinghouse.
29.2.4 Thick WHOIS
CoCCA will provide Thick WHOIS to enhance accessibility and stability and reduce malicious behavior thereby promoting increased rights protection mechanisms and investigations where applicable. All WHOIS services meet Specification 4 of the Registry Agreement in support of Thick WHOIS. The agreement between Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. and its Registrars specifies that Registrant information should be complete

and accurate and instances where incomplete information occurs will be investigated to prevent reoccurrence. Given the current state nature of WHOIS, CoCCA intends to adapt to new formats and protocols as they go into effect.

29.2.5 Registrar Relationship

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. views the protection of legal rights of a user's domain name and that of trademark owners as a strategic imperative to operating a successful TLD. Therefore, ICANN accredited Registrars will only be used and be bound to the registry-registrar agreement. Certain components of the RPM framework will be administered on behalf of Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.. To ensure compliance with designated RPMs, CoCCA will conduct annual reviews and enforce non-compliance where necessary. In cases where Registrars fail to meet Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' standards, the Registrar will lose its certification to register domains of the TLD until all issues are resolved.

29.2.6 Uniform Dispute Resolution Policy (UDRP)

The UDRP is a proven rights protection mechanism whereby complainants can object to a domain registration via a UDRP provider. The Registrant in question has the opportunity to respond to the complaint and defend its registration and use as good faith. The UDRP provider and assigned panel provide a decision based on the information submitted by both the complainant and the respondent. Where the complainant is successful in proving a bad faith registration ownership of the domain will be transferred accordingly and in line with ICANN policy. Conversely, where the complainant is unable to prove bad faith, the domain registration will remain with the assigned Registrant. Registrars of Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' must implement and respond to UDRP policy where applicable. Penalties will apply where Registrars are found to be in breach.

29.2.7 Uniform Rapid Suspension (URS)

CoCCA is required to implement the Uniform Rapid Suspension (URS) per the Applicant Guidebook. If an infringement is discovered, the complainant may file an objection with a URS provider. The URS provider will investigate compliance via an administrative review. Upon a successful review, the URS provider will notify Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. to place the domain in question in lock status within NEED A TIMEFRAME, meaning that no changes to registration data will occur, but the domain continues to resolve. Upon lock of the domain, the Registrant will be notified and have an opportunity to respond. If the complainant proves the domain is used in an abusive manner, the domain name will be suspended for the remainder of the registration period and will resolve to an informational site provided by the URS provider. The complainant will have the opportunity to extend the registration for one additional year. Conversely, if the evidence does not result in a successful determination of abuse, the URS Provider will contact CoCCA and controls of the registered domain will be returned to the Registrant.

29.2.8 Post-Delegation Dispute Resolution Procedure (PDDRP)

Per the Applicant Guidebook, CoCCA is required to implement the Post-Delegation Dispute Resolution Procedure (PDDRP) that allows a complainant the right to object to Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' manner of operation or use of the gTLD. A PDDRP provider will accept objections and perform a threshold review. CoCCA will respond to the complaint as necessary to defend the operation and use Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' .persiangulf gTLD.

29.2.9 Registration Restriction Dispute Resolution Procedure (RRDRP)

The Registration Restrictions Dispute Resolution Procedure (RRDRP) outlines the resolution proceedings whereby the Complainant determines that Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has failed to comply with its defined registration restrictions. The parties to the dispute will be the gTLD registry operator and the harmed established institution where proper standing has been reviewed and confirmed. A successful complaint proves that the complainant is a defined community and that a strong association exists between it and the gTLD string. Further proof must be submitted that Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. violated its community-based restrictions and that measurable harm occurred. Upon administrative review of the complaint, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will file a response within 10 days of the filing.

If the complainant is determined to be the prevailing party, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will pay all Panel and Provider fees incurred, including filing fees. If Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. is found to have violated its registration restrictions, Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will implement all remedial measures outlined by the Expert Panel, including cases where registration suspension may occur. Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. recognizes that this procedure does not preclude entities seeking remedies in courts of laws.

29.2.10 Limited License

Limited License- Registration policies and terms and conditions limit registrants' rights to a limited license to use (but not to sub-license the use of any portion of) the allocated TLD, subject to continuing compliance with all policies in place during that time.

29.2.11 Rapid Takedown & Suspension

CoCCA, at Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' request, will comply with any takedown or suspension. Usually, these types of requests are based on court orders of competent jurisdiction, but not limited to such. Before any domain take down, CoCCA maintains an internal checklist that will be followed to ensure validation of the request. If for any reason the validation procedure fails, the CoCCA Ombudsman will be notified. Upon confirmation that the registered domain is to be suspended or removed from the zone, CoCCA will execute its auditable procedure documenting the incident number, date, time, domain name, threat level, description and reason for the take down, and any other evidence that may be necessary to properly document the take down. The Ombudsman, Registrar, and Registrant will be notified before and at the time of take down execution.

29.2.13 Malware Mitigation

Where commercially sensible, or a risk factor has been identified, CoCCA will perform automated and regular scanning for malware of all domains (or a subset of domains) in the registry. Often, Registrants are unaware and compromised by malware deployments. Scanning for malware reduces occurrences for this type of abusive behavior for registered domain names in the TLD.

29.2.14 Phishing Mitigation

CoCCA will establish and act upon the results of a regular poll against one or more trusted databases for phishing sites operating (in second level or subordinate domains) within the TLD. Phishing activity most often occurs through a subordinate domain, rather than a directly registered second level domain. For this reason the registry should query for any wild-card occurrence of a domain that has been flagged as a phishing site or one that contains malware.

29.2.15 DNSSEC Deployment

As part of Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' mission to maintain a highly secure and

stable TLD, CoCCA will implement DNSSEC as part of its backend registry services. DNSSEC helps mitigate, for example, pharming attacks that use cache poisoning to redirect unsuspecting users to fraudulent websites or addresses. DNSSEC protects the DNS system from abuse threats in the following aspects:
Security of Domain Resolution - DNSKEY/RRSIG provide authentication and integrity verification to ensure data will be compromised during transmission. The CoCCA credit name server trust anchor is signed by the public key and then delivered to the Interim Trust Anchor Repository (ITAR) for TLD verification. NSEC resource records will also be used to verify negative response messages of queried resource records to ensure deletion does not occur during transmission.
Security of Zone File Distribution - TSIG allows communication among authentication servers to ensure that it is the correct server and that data is not compromised during transmission.
29.2.16 Law Enforcement and Anti-Abuse Community Collaboration
CoCCA does and will continue to cooperate closely with anti-abuse communities, experts, and law enforcement in the mitigation and prevention of abuse behavior. Not only will best practice be shared, but also collaboration on the latest issues will remain a priority. In addition to collaboration instances may take the form of early notification by security agency of malicious content. Another form of cooperation may be the provision of user information (including historical and non-publicly available information, where available) to the security agency, to assist identification of wrongdoers. The existence of existing arrangements for dealings between security agencies and the registry operator facilitates the ability for both registry and law enforcement to react promptly to threats, promptly minimizing harm. With respect to suspensions, the registrant will be given an opportunity to remedy via automated processes, given the time sensitive nature of criminal activity automated suspension based on triggers / flags, or at the request of law enforcement should be enabled. Critical domains can be manually "Super Locked" in the registry to ensure they are not removed from the zone or suspended inadvertently by automated suspension technology. Automated suspensions will only be initiated when required to protect the public interest or network integrity. They should not be initiated to simply protect an entity's or individuals intellectual or other property rights - those sorts of disputes should be dealt with via a formal complaint resolution service.
29.3 Resource Plans
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. will dedicate 2 professionals to coordinate the operation of the .persiangulf gTLD. At the same time, the technical professionals at CoCCA will be supporting the vast majority of the technical aspects of operating the .persiangulf gTLD.
As the .persiangulf gTLD is a community-supported effort, it is also expected that members of the community will help Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. develop policies and procedures that govern the operation of the gTLD.

The following Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. team members will be used to support the rights protection plan; CoCCA NOC Support, Ombudsman.

CoCCA acting as Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.' registry services provider maintains a resource model to meet the demands of RPM implementation and on-going operation of the protection mechanisms. CoCCA maintains a qualified and experienced technical staff to support registry services that meet or exceed defined service levels.
The CoCCA workforce-staffing model is sized to provide the appropriate services for each managed TLD. Given the dynamic nature of technologies and innovation, the CoCCA staff model is constantly reviewed and adjusted to achieve optimization without sacrifice to customer satisfaction and service level requirements. In cases where growth dictates an increase in staff, CoCCA maintains a proven staffing process for acquiring qualified candidates. Details of staffing resource plans can be found in response to questions of the Financial Projections section of the application.

There are eight CoCCA CRS Officers whose Role is to monitor registry services and review Complaints lodged online or from Law Enforcement / CERTs CoCCA has an established formal relationship with.

The complaints are dealt with in accordance with the CRS and AUP / Registrant Agreement, which allows the CRS officers discretion to suspend a domain instantly or send the complaint to the Ombudsman for amicable complaint resolution. CRS officers are available twenty-four hours a day, seven days a week, and three hundred and sixty five days a year.
CoCCA estimates it will require the following personnel to support the RPM implementation and operations for Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.:

Complaint Resolution Service Officers: 8
Complaint Resolution Expert - Minimum of Eight
Ombudsman - One

30A. Security Policy: provide a summary of the security policy for the proposed registry, including but not limited to:

- indication of any independent assessment reports demonstrating security capabilities, and provisions for periodic independent assessment reports to test security capabilities;
- description of any augmented security levels or capabilities commensurate with the nature of the applied for gTLD string, including the identification of any existing international or industry relevant security standards the applicant commits to following (reference site must be provided);
- list of commitments made to registrants concerning security levels.

To be eligible for a score of 2, answers must also include:

- Evidence of an independent assessment report demonstrating effective security controls (e.g., ISO 27001).

A summary of the above should be no more than 20 pages. Note that the complete security policy for the registry is required to be submitted in accordance with 30(b).

Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. and CoCCA desire to ensure the highest levels of security are applied and maintained for all elements in the chain that ultimately result in the resolution of a .persiangulf TLD on the Internet. CoCCA, together with partners PCH and ISC will endeavor to ensure the secure operation of Registry Services for the .persiangulf TLD as described below.

30.1 DNSSEC - Facility for Key Storage
For reasons of economies of scale and because CoCCA has a nearly decade long relationship with PCH, the .persiangulf key is to be stored offline at a Singapore facility hosted by the National University of Singapore, on behalf of the Singaporean Infocomm Development Agency (IDA), other DNSSEC key-store facilities that are part of PCH's project are hosted in Zurich by SWITCH, the Swiss national research and education network and at a U.S. facility hosted by Equinix in San Jose California. The PCH DNSSEC project facilities mirror the security and processes used by ICANN for maintenance of the root.

See Attachment PCH_SG_Backgrounder.pdf

30.1.1 Signature of the .persiangulf

The .persiangulf zones generated by the CoCCA SRS will include the DS records submitted by registrars, zones will be transferred from CoCCA's hidden signing master DNS to four PCH inbound masters using AXFER / IXFER and TSIG. PCH will transfer the zones using IXFR / AXFRE and TSIG to their signer servers in Frankfurt and Palo Alto. The signed zone is then exported to PCH's two outbound DNSSEC DNS for secure ASXFR / IXFR TSIG transfer back to CoCCA's inbound DNSSEC master in Sydney. Key signing keys and zone signing keys are to be rolled out in accordance with best practices and ICANN requirements. CoCCA and PCH's DNSSEC implementation fully adheres to applicable RFC's and to the requirements of Specification 6, section 1.3.

30.1.2 Secure Distribution of the Signed Zones

CoCCA has employed the use of a double Anycast and Unicast network for the purpose of distributing signed zones across the DNS. Due to CoCCA's desire to ensure that this process is not compromised, CoCCA logs and monitors the zone signing and distribution process, and also ensures that the management of signed zones is performed by CoCCA.

On receipt of the signed zones from PCH, CoCCA will perform some basic validation against the zones sent to PCH, and then transfer these zones onto a hidden distribution master DNS which will transfer zones via TSIG and IXAFR/ AXFR to ISC's SNC platform, PCH's Anycast platform and CoCCA's Unicast DNS servers. If a critical issue was found that was impacting both the primary and secondary SRS, and if instructed by CoCCA, PCH may distribute the zones to their own Anycast network, the ISC SNS Anycast network and the CoCCA Unicast nodes.

The procedures above have been tested by ccTLDs on CoCCA's SRS platform.

30.2 Securing the .persiangulf DNS infrastructure and Nodes

The .persiangulf TLD will rely on ISC's and PCH's Anycast networks and CoCCA's Unicast for resolution. ISC authors BIND and pioneered the use of DNSSEC and Anycast technology, PCH manages what is arguably the largest, most geographically dispersed Anycast network, CoCCA currently operates Unicast TLD servers for 12 TLDs. All three entities utilize best of class technology and have rigorous security policies in place to secure, monitor and respond to threats that may compromise the resolution of the .persiangulf TLD.
Both PCH and ISC are members of NSP-Sec and have BGP sinkhole capabilities. Both organizations are well positioned and able to coordinate with ISPs that may be transiting or sourcing Denial of Service attacks (DoS) or other attack traffic to mitigate it closer to its source. The geographically diverse PCH and ISC Anycast services are extremely resilient against DoS attacks, if a node fails or is otherwise compromised, it will swiftly be taken out of the PCH or ISC Anycast cloud, causing traffic to flow to other nodes with minimal or no service disruption. The two independently operated and managed Anycast network's total distributed capacity will allow the .persiangulf to absorb even a coordinated DoS attack originating from multiple locations at once.

The geographically diverse Anycast network proposed for .persiangulf necessitates locating dozens of nodes in a variety of co-location facilities varying from Tier 4 to Tier 2 - and each facility has different security policies for physical access. From a security and stability perspective, the critical issue is that all nodes be monitored in real time by PCH, ISC and CoCCA and any node that experiences SLA issues (or is otherwise compromised) is swiftly taken offline or out of the Anycast network. Under CoCCA's agreements with PCH and ISC, any SLA or security issues with any node in their respective Anycast networks is to be reported immediately so that CoCCA may advise registrars or take any other appropriate action.

30.3 CoCCA's Sydney SRS Security Policy

30.3.1 CoCCA SYD NOC | SRS Physical Access
CoCCA's primary NOC is located at Global Switch in the Sydney CBD, an enhanced Tier-3 facility and one of the largest carrier neutral data centers in the southern hemisphere. CoCCA's SRS servers are housed in a dedicated, caged rack provided by PIPE networks, PIPE also provides CoCCA with the primary bandwidth used by the Sydney SRS.

In order to gain physical access to CoCCA's servers, an individual must be pre-authorised by CoCCA, pipe and Global Switch - and have formally been inducted by Global Switch. Once approved to enter the facility, an individual must be inspected and be granted access by the Global Switch Security Operations Centre - which is manned 24x7 by security personnel. After passing security, physical access requires passing through a mantrap. Access to the floor, pipe co-location room and master cage is controlled by key-cards with strict access control lists.

Access to CoCCA's cage and rack require a combination of key-cards and physical keys both of which are distributed by, and only available to, CoCCA staff. All spaces are under constant CCTV surveillance by global switch security and the PIPE Network's NOC.

CoCCA's policy is to severely restrict physical access to network appliances, currently only six individuals have physical access to the CoCCA SRS in Sydney and all access is logged. CoCCA's security policy for physical access is collateral to the Global Switch and PIPE Networks.

30.3.2 CoCCA SYD NOC | SRS Admin Remote Access

The number of individuals with the ability to directly access and administer network appliances is very small - currently six, a number not expected to grow with additional gTLDs. Remote access is only accessible through VPN with the mandatory requirement to use one time passwords (OTP) for authentication purposes. SRS server command line logins use both OTP as well as traditional username and password authentication methods - enabling each login to be traced to an individual.

CoCCA NOC Support Staff, Registrar Support and Complaint / Abuse Officers and Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. staff may only access the SRS via port 443 with OTP from trusted IP addresses. CoCCA NOC Support Staff, Registrar Support and Complaint / Abuse Officers and Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. staff have no physical or remote administrative access to servers or network appliances.

30.3.3 CoCCA's "pamoja" SRS Software Testing

In designing any security regime it is important to clearly identity potential threats and design the policy to address them. The SRS data is a compilation of publicly available data, and all information on Registrants, Registrars, and Resellers is available via WHOIS, RDDS services or Historical Abstracts. CoCCA does not store credit card or other commercially sensitive confidential information on registrants or registrars in the SRS (or elsewhere). The security threat is not theft of SRS data, it is loss of data or tampering with data.

Information relating to the management of the Data Escrow processes performed by NCC and CoCCA Data Escrow (NZ) Limited, including information in relation to the backup policies are explained in response to question 38. The Data Escrow process ensures that data is protected against security breaches that result in the loss or unauthorized modification of SRS data, especially as the data can be recovered from several sources. The CoCCA security policy is designed to protect against un-authorized modification of production SRS data.

The only information stored in the SRS that could present a risk should the entire SRS be compromised, stolen and released "into the wild" are SRS credentials and AuthCodes. The credentials and AuthCodes are Hashed (MD5) and Encrypted in the DB. GUI access to CoCCA's production systems is only granted from trusted IP's with a requirement for OTP use. For EPP access to the production SRS, the registrar's IP must be white-listed and they must connect with a CoCCA issued SSL certificate. Even if one were able to steal the SRS DB and de-crypt the login credentials or AuthCodes, other security measures such as IP address locking, OTP and CoCCA issued certificates ensure potential data thieves would not be able to use them to access CoCCA's production SRS or modify data.

Securing the SRS largely requires ensuring the SRS software cannot be exploited by users. The SRS has four public facing websites, the WHOIS, RDDS, Historical Abstracts and Key Retrieval. The GUI login is not public facing.

CoCCA uses the same "pamoja" SRS database application that it distributes to over 20+ other TLD managers. While the application is tested internally by CoCCA and other TLD manager's, developers and systems administrators, CoCCA has a policy that each major release also be tested by an independent software testing laboratory. Currently we have contracted with Yonita (http://yonita.com). Yonita tests / audits the pamoja SRS application (not CoCCA's NOC) for:

* Security vulnerabilities
* Standard quality defects
* Performance anti-patterns
* Database and transaction misuses
* Concurrency issues
* Architectural bad practices

30.3.4 Monitoring and Detecting Threats

CoCCA monitors network traffic and activity through automated processes and seeks to detect threats that impact the SRS and more broadly CoCCA's Registry Services.

PCH and ISC directly monitor and attempt to detect threats that impact the DNSSEC signing and storage facilities as well as PCH's and ISC's respective Anycast networks. Any incident that impacts the security and stability of the .persiangulf TLD in either the PCH DNSSEC facilities or nodes on the ISC or PCH Anycast networks is logged and reported to the CoCCA NOC immediately. ISC and PCH have near-real time reporting for all the Anycast nodes in their clouds and make this information available to CoCCA.

30.3.5 CoCCA SRS NOC | Essential Services Policy

CoCCA's Security Policy mandates that only essential SRS services (production EPP, WHOIS, RDDS, and SRS GUI with limited access) are to be hosted at the Sydney NOC.

Public facing policy websites, email servers, help-desk software, svn, GIT, team sites, OTE environments, and software development servers are all hosted externally using various commercial cloud - based services. None of these cloud-based servers are configured in such a way that they have access to any SRS services that are not normally available to the public.

30.3.6 CoCCA SRS NOC | Public Access Restrictions Policy

CoCCA's security policy dictates that only the port 43 WHOIS server, port 443 web-based WHOIS, port 443 AuthCode retrieval site, and port 443 Historical Abstract Site and a single unicast DNS server for the .persiangulf TLD are to be publicly accessible.

Registrars, CoCCA's registrar support staff, law enforcement or CERTs may access the port 443 GUI interface only if their IP addresses have been white listed in advance and they authenticate using clientID, login and an OTP. CoCCA's use of OTP tokens allows CoCCA to track activity in the SRS by individual not just loginID (username).

30.3.7 CoCCA SRS NOC | Intrusion Detection

CoCCA Security Policy requires that all SRS traffic originating from outside the NOC be subjected to automated intrusion detection. CoCCA's firewalls (Watchgaurd XTM) are configured for intrusion detection and are able to inspect encrypted HTTPS traffic. CoCCA's Barracuda load balancers provide an additional layer of firewall protection, DoS and automated intrusion detection. CoCCA's NOC firewalls are configured in accordance with best practices with both port and application layer filtering. The load balancers are configured for NAT and are also configured for intrusion detection and DoS attacks.

30.3.8 CoCCA SRS NOC | Auditing an Logging

CoCCA's Security Policy requires that all access to the SRS via the port 443 GUI is logged with originating IP, clientID, OTP (generated by security token), and that the sessions are time and date stamped. All EPP and WHIOS access logs are to be stored for seven days in the production SRS where they can be readily accessed before being archived. Firewall and VPN access is also logged.

30.3.9 CoCCA SRS NOC | Incident Response

CoCCA NOC Support staff are on hand 24/7/365 to monitor the Registry Services offered at the primary SRS in Sydney and the availability of the Failover and Escrow SRS facilities. NOC Staff perform three "roles":

1) monitoring the CoCCA Sydney NOC and failover SRS's - and a dozen or so other SRS's that CoCCA supports;
2) registrar support for the CoCCA NOC and four other locally hosted ccTLDs; and
3) serve as front-line Complaint Resolution Service Officers able to trigger a CoCCA Critical Issue Suspension (CIS) or Uniform Rapid Suspension on a 24/7/365 basis.

The level of SRS access and skills required to perform all three roles are similar. CoCCA NOC support staff have no VPN access or other access to appliances at the CoCCA SRS. The GUI access they have is limited to Customer Service functions, and all the applications they use (helpdesk, monitoring, accounting, email) are hosted outside the primary NOC.

CoCCA's NOC support is a virtual "function" performed by individuals in New Zealand, Guyana and France (additional NOC staff will be trained and other centers incorporated into the service in Q4 2012). If there is a failure in any of CoCCA's Registry Services functions, the role of the NOC Support is to:

1) raise the alarm with CoCCA systems administrators or developers as conditions and events dictate;
2) liaise with PIPE Networks, PCH, ISC, IANA / ICANN and registrars as required.

30.3.10 Provisioning against DNS Denial of Service attacks

A Denial of Service (DoS) attack on a network service floods it with fraudulent requests so that there is no capacity left for legitimate requests. CoCCA's Anycast DNS service is outsourced to PCH and ISC's Anycast networks, CoCCA's managed Unicast DNS ensures Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. has at least two "last resort" DNS nodes under direct management. Both PCH and ISC networks provide the .persiangulf with substantial protection against DoS attacks, including Anycasting, over provisioning, and network traffic shaping.

Both PCH and ISC utilize traffic shaping methods that rate limit the number of queries per IP address to help prevent abuse and to trigger an investigation of elevated traffic levels to see whether an attacker is testing resource limits or whether ISC or PCH should provision additional bandwidth/servers or remove the node temporarily. In cases of an active DoS against ISC, CoCCA or PCH each will make every effort to identify the offending traffic and its sources to squelch offending traffic at ISP borders before reaching the servers as well as augmenting capacity to handle any legitimate elevated traffic levels.

30.3.11 Provisioning against WHOIS and EPP Denial of Service attacks

CoCCA actively monitors all Registry Services to ensure they meet any required SLA. In the event of a DoS attack that threatens to lower the SLA for WHOIS or EPP services required in the ICANN Agreement, CoCCA will work with our upstream providers (who also monitor the traffic) and attempt to squelch offending traffic at the ISP borders before it reaches the CoCCA RDDS servers. In the event the traffic is found to be legitimate, the bandwidth can be swiftly increased as required.

30.3.12 Failover Routing

CoCCA currently has multiple links to the Internet but does not load balance across them all. The secondary (failover) link is used to replicate and transfer backup WAL and VM image data files to CoCCA's Failover SRS infrastructure (currently located in Palo Alto) and Escrow NOC. If there is a critical infrastructure issue at PIPE Networks, BGP routing will be used to move our critical infrastructure on our IPV4 and IPV6 address blocks to the failover Telstra link or to one of the two SRS instances outside of Australia. A forth node will be added in Paris (France) in early 2013.

If the issue relates to an SLA problem, changing the A record and CNAME for RDDS services may be sufficient to resolve such an issue in a timely manner. If required by a pro-longed outage BGP routing may be used to re-rout the entire ranges to a failover facility.

30.3.13 Commitments to Registrants

Taken from the .persiangulf WHOIS and Privacy Policy

"6. DATA SECURITY

6.1 CoCCA shall take reasonable steps to protect the Personal Information it holds from misuse and loss and from unauthorized access, modification or disclosure.

7. OPENNESS

7.1 This Policy sets out CoCCA's policies on its management of Personal Information. CoCCA shall make this document available to anyone who asks for it.

7.2 On request by any person, CoCCA shall take reasonable steps to let the person know, generally, what sort of Personal Information CoCCA holds, for what purposes, and how it collects, holds, uses and discloses that information.

8. ACCESS AND CORRECTION
8.1 All Registrant information lodged by a registrar that is maintained in the CoCCA SRS is publicly available from CoCCA's RDDS services - WHOIS, Premium WHOIS, and Historical Abstracts.

See the .persiangulf RDDS Policy (Attached) for more information.

8.2 If CoCCA holds Personal Information about a Registrant and the Registrant is able to establish that the information is not true, accurate, and complete and/or up-to-date, CoCCA shall take reasonable steps to facilitate corrections to the information so that current information is accurate, complete and up-to-date - except where the data is contained in an historical record or archive."

30.3.14 Independent Security Assessments

In addition to software and source security Audits, CoCCA has engaged the services of Connell Wagner Pty Ltd (now known as Aurecon Group Brand (Pte) Ltd) for the purpose of performing independent security audits of the primary data center.

On the condition that a gTLD is approved, CoCCA will engage the services of Aurecon to perform independent security audits to ensure the CoCCA system fully complies with all published security requirements set forth by ICANN. Such reports will be provided to ICANN on request. With new IT infrastructure planned for deployment in 2012 and early 2013, CoCCA will contract further independent assessments with third parties.

Annex 23

Governmental Advisory Committee

Beijing, People's Republic of China – 11 April 2013

GAC Communiqué – Beijing, People's Republic of China[1]

I. Introduction

The Governmental Advisory Committee (GAC) of the Internet Corporation for Assigned Names and Numbers (ICANN) met in Beijing during the week of 4 April 2013. Sixty-one (61) GAC Members participated in the meetings and eight (8) Observers. The GAC expresses warm thanks to the local hosts China Internet Network Information Center (CNNIC), China Organizational Name Administration Center (CONAC), and Internet Society of China for their support.

II. Internal Matters

1. New Members and Observers

The GAC welcomes Belarus, Cape Verde, Côte d'Ivoire, Lebanon, and the Republic of the Marshall Islands to the Committee as members, and The World Meteorological Organisation as an Observer.

2. GAC Secretariat

Following a request for proposals, the GAC received presentations from two organizations and agreed that one such candidate should be providing secretariat services to the GAC, with the aim of becoming operational as soon as possible. Negotiations with such organization will start immediately after the Beijing meeting.

[1] To access previous GAC advice, whether on the same or other topics, past GAC communiqués are available at: https://gacweb.icann.org/display/gacweb/GAC+Recent+Meetings and older GAC communiqués are available at: https://gacweb.icann.org/display/gacweb/GAC+Meetings+Archive.

3. GAC Leadership

The GAC warmly thanks the outgoing Vice-Chairs, Kenya, Singapore, and Sweden and welcomes the incoming Vice-Chairs, Australia, Switzerland and Trinidad & Tobago.

III. Inter-constituencies Activities

1. Meeting with the Accountability and Transparency Review Team 2 (ATRT 2)

The GAC met with the ATRT 2 and received an update on the current activities of the ATRT 2. The exchange served as an information gathering session for the ATRT 2 in order to hear GAC member views on the Review Team processes and areas of interest for governments. The GAC provided input on governmental processes and the challenges and successes that arose during the first round of reviews, and implementation of the GAC related recommendations of the first Accountability and Transparency Review Team.

2. Board/GAC Recommendation Implementation Working Group (BGRI-WG)

The Board–GAC Recommendation Implementation Working Group (BGRI–WG) met to discuss further developments on ATRT1 recommendations relating to the GAC, namely recommendations 11 and 12. In the context of Recommendation 11, the GAC and the Board have concluded the discussion and agreed on the details of the consultation process mandated per ICANN Bylaws, should the Board decide not to follow a GAC advice. With respect to Recommendation 12, on GAC Early Engagement, the BGRI-WG had a good exchange with the GNSO on mechanisms for the GAC to be early informed and provide early input to the GNSO PDP. The BGRI–WG intends to continue this discussion intersessionally and at its next meeting in Durban.

3. Brand Registry Group

The GAC met with the Brand Registry Group and received information on its origins, values and missions.

4. Law Enforcement

The GAC met with law enforcement representatives and received an update from Europol on the Registrar Accreditation Agreement (RAA).

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The GAC warmly thanks the Accountability and Transparency Review Team 2, the Brand Registry Group, Law Enforcement, and the ICANN Board who jointly met with the GAC as well

as all those among the ICANN community who have contributed to the dialogue with the GAC in Beijing.

IV. GAC Advice to the ICANN Board[2]

1. New gTLDs

a. GAC Objections to Specific Applications

i. The GAC Advises the ICANN Board that:

i. The GAC has reached consensus on GAC Objection Advice according to Module 3.1 part I of the Applicant Guidebook on the following applications:[3].

1. The application for .africa (Application number 1-1165-42560)
2. The application for .gcc (application number: 1-1936-2101)

ii. With regard to Module 3.1 part II of the Applicant Guidebook[4]:

1. The GAC recognizes that Religious terms are sensitive issues. Some GAC members have raised sensitivities on the applications that relate to Islamic terms, specifically .islam and .halal. The GAC members concerned have noted that the applications for .islam and .halal lack community involvement and support. It is the view of these GAC members that these applications should not proceed.

b. Safeguard Advice for New gTLDs

To reinforce existing processes for raising and addressing concerns the GAC is providing safeguard advice to apply to broad categories of strings (see Annex I).

c. Strings for Further GAC Consideration

In addition to this safeguard advice, that GAC has identified certain gTLD strings where further GAC consideration may be warranted, including at the GAC meetings to be held in Durban.

i. Consequently, **the GAC advises the ICANN Board** to: not proceed beyond Initial Evaluation with the following strings : .shenzhen (IDN in Chinese), .persiangulf, .guangzhou (IDN in Chinese), .amazon (and IDNs in Japanese and Chinese), .patagonia, .date, .spa, . yun, .thai, .zulu, .wine, .vin

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[2] To track the history and progress of GAC Advice to the Board, please visit the GAC Advice Online Register available at: https://gacweb.icann.org/display/gacweb/GAC+Recent+Meetings

[3] Module 3.1: "The GAC advises ICANN that it is the consensus of the GAC that a particular application should not proceed. This will create a strong presumption for the ICANN Board that the application should not be approved.

[4] Module 3.1: "The GAC advises ICANN that there are concerns about a particular application "dot-example." The ICANN Board is expected to enter into dialogue with the GAC to understand the scope of concerns. The ICANN Board is also expected to provide a rationale for its decision.

d. The GAC requests:

i. a written briefing about the ability of an applicant to change the string applied for in order to address concerns raised by a GAC Member and to identify a mutually acceptable solution.

e. Community Support for Applications

The GAC advises the Board:

i. that in those cases where a community, which is clearly impacted by a set of new gTLD applications in contention, has expressed a collective and clear opinion on those applications, such opinion should be duly taken into account, together with all other relevant information.

f. Singular and plural versions of the same string as a TLD

The GAC believes that singular and plural versions of the string as a TLD could lead to potential consumer confusion.

Therefore **the GAC advises the ICANN Board to:**

i. Reconsider its decision to allow singular and plural versions of the same strings.

g. Protections for Intergovernmental Organisations

The GAC stresses that the IGOs perform an important global public mission with public funds, they are the creations of government under international law, and their names and acronyms warrant special protection in an expanded DNS. Such protection, which the GAC has previously advised, should be a priority.

This recognizes that IGOs are in an objectively different category to other rights holders, warranting special protection by ICANN in the DNS, while also preserving sufficient flexibility for workable implementation.

The GAC is mindful of outstanding implementation issues and commits to actively working with IGOs, the Board, and ICANN Staff to find a workable and timely way forward.

Pending the resolution of these implementation issues, the **GAC reiterates its advice to the ICANN Board that:**

i. appropriate preventative initial protection for the IGO names and acronyms on the provided list be in place before any new gTLDs would launch.

2. Registrar Accreditation Agreement (RAA)

Consistent with previous communications to the ICANN Board

a. **the GAC advises the ICANN Board that:**

i. the 2013 Registrar Accreditation Agreement should be finalized before any new gTLD contracts are approved.

The GAC also strongly supports the amendment to the new gTLD registry agreement that would require new gTLD registry operators to use only those registrars that have signed the 2013 RAA.

The GAC appreciates the improvements to the RAA that incorporate the 2009 GAC-Law Enforcement Recommendations.

The GAC is also pleased with the progress on providing verification and improving accuracy of registrant data and supports continuing efforts to identify preventative mechanisms that help deter criminal or other illegal activity. Furthermore the GAC urges all stakeholders to accelerate the implementation of accreditation programs for privacy and proxy services for WHOIS.

3. WHOIS

The GAC urges the ICANN Board to:

a. ensure that the GAC Principles Regarding gTLD WHOIS Services, approved in 2007, are duly taken into account by the recently established Directory Services Expert Working Group.

The GAC stands ready to respond to any questions with regard to the GAC Principles.

The GAC also expects its views to be incorporated into whatever subsequent policy development process might be initiated once the Expert Working Group concludes its efforts.

4. International Olympic Committee and Red Cross /Red Crescent

Consistent with its previous communications, **the GAC advises the ICANN Board to:**

a. amend the provisions in the new gTLD Registry Agreement pertaining to the IOC/RCRC names to confirm that the protections will be made permanent prior to the delegation of any new gTLDs.

5. Public Interest Commitments Specifications

The GAC requests:

b. more information on the Public Interest Commitments Specifications on the basis of the questions listed in annex II.

V. Next Meeting

The GAC will meet during the period of the 47th ICANN meeting in Durban, South Africa.

ANNEX I

Safeguards on New gTLDs

The GAC considers that Safeguards should apply to broad categories of strings. For clarity, this means any application for a relevant string in the current or future rounds, in all languages applied for**.**

The GAC advises the Board that all safeguards highlighted in this document as well as any other safeguard requested by the ICANN Board and/or implemented by the new gTLD registry and registrars should:

- be implemented in a manner that is fully respectful of human rights and fundamental freedoms as enshrined in international and, as appropriate, regional declarations, conventions, treaties and other legal instruments – including, but not limited to, the UN Universal Declaration of Human Rights.
- respect all substantive and procedural laws under the applicable jurisdictions.
- be operated in an open manner consistent with general principles of openness and non-discrimination.

Safeguards Applicable to all New gTLDs

The GAC Advises that the following six safeguards should apply to all new gTLDs and be subject to contractual oversight.

1. **WHOIS verification and checks** —Registry operators will conduct checks on a statistically significant basis to identify registrations in its gTLD with deliberately false, inaccurate or incomplete WHOIS data at least twice a year. Registry operators will weight the sample towards registrars with the highest percentages of deliberately false, inaccurate or incomplete records in the previous checks. Registry operators will notify the relevant registrar of any inaccurate or incomplete records identified during the checks, triggering the registrar's obligation to solicit accurate and complete information from the registrant.

2. **Mitigating abusive activity**—Registry operators will ensure that terms of use for registrants include prohibitions against the distribution of malware, operation of botnets, phishing, piracy, trademark or copyright infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.

3. **Security checks**— While respecting privacy and confidentiality, Registry operators will periodically conduct a technical analysis to assess whether domains in its gTLD are being used to perpetrate security threats, such as pharming, phishing, malware, and botnets. If Registry operator identifies security risks that pose an actual risk of harm, Registry operator will notify the relevant registrar and, if the registrar does not take immediate action, suspend the domain name until the matter is resolved.

4. **Documentation**—Registry operators will maintain statistical reports that provide the number of inaccurate WHOIS records or security threats identified and actions taken as a result of its periodic WHOIS and security checks. Registry operators will maintain these reports for the agreed contracted period and provide them to ICANN upon request in connection with contractual obligations.

5. **Making and Handling Complaints** – Registry operators will ensure that there is a mechanism for making complaints to the registry operator that the WHOIS information is inaccurate or that the domain name registration is being used to facilitate or promote malware, operation of botnets, phishing, piracy, trademark or copyright infringement, fraudulent or deceptive practices, counterfeiting or otherwise engaging in activity contrary to applicable law.

6. **Consequences** – Consistent with applicable law and any related procedures, registry operators shall ensure that there are real and immediate consequences for the demonstrated provision of false WHOIS information and violations of the requirement that the domain name should not be used in breach of applicable law; these consequences should include suspension of the domain name.

The following safeguards are intended to apply to particular categories of new gTLDs as detailed below.

Category 1

Consumer Protection, Sensitive Strings, and Regulated Markets:

The GAC Advises the ICANN Board:

- Strings that are linked to regulated or professional sectors should operate in a way that is consistent with applicable laws. These strings are likely to invoke a level of implied trust from consumers, and carry higher levels of risk associated with consumer harm. The following safeguards should apply to strings that are related to these sectors:

    1. Registry operators will include in its acceptable use policy that registrants comply with all applicable laws, including those that relate to privacy, data collection, consumer protection (including in relation to misleading and deceptive conduct), fair lending, debt collection, organic farming, disclosure of data, and financial disclosures.
    2. Registry operators will require registrars at the time of registration to notify registrants of this requirement.
    3. Registry operators will require that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of those services, as defined by applicable law and recognized industry standards.
    4. Establish a working relationship with the relevant regulatory, or industry self-regulatory, bodies, including developing a strategy to mitigate as much as possible the risks of fraudulent, and other illegal, activities.

5. Registrants must be required by the registry operators to notify to them a single point of contact which must be kept up-to-date, for the notification of complaints or reports of registration abuse, as well as the contact details of the relevant regulatory, or industry self-regulatory, bodies in their main place of business.

In the current round the GAC has identified the following non-exhaustive list of strings that the above safeguards should apply to:

- **Children:**
  - .kid, .kids, .kinder, .game, .games, .juegos, .play, .school, .schule, .toys
- **Environmental:**
  - .earth, .eco, .green, .bio, .organic
- **Health and Fitness:**
  - .care, .diet, .fit, .fitness, .health, .healthcare, .heart, .hiv, .hospital,, .med, .medical, .organic, .pharmacy, .rehab, .surgery, .clinic, .healthy (IDN Chinese equivalent), .dental, .dentist .doctor, .dds, .physio
- **Financial:**
  - capital, . cash, .cashbackbonus, .broker, .brokers, .claims, .exchange, .finance, .financial, .fianancialaid, .forex, .fund, .investments, .lease, .loan, .loans, .market, . markets, .money, .pay, .payu, .retirement, .save, .trading, .autoinsurance, .bank, .banque, .carinsurance, .credit, .creditcard, .creditunion,.insurance, .insure, ira, .lifeinsurance, .mortgage, .mutualfunds, .mutuelle, .netbank, .reit, .tax, .travelersinsurance, .vermogensberater, .vermogensberatung and .vesicherung.
- **Gambling:**
  - .bet, .bingo, .lotto, .poker, and .spreadbetting, .casino
- **Charity:**
  - .care, .gives, .giving, .charity (and IDN Chinese equivalent)
- **Education:**
  - degree, .mba, .university
- **Intellectual Property**
  - .audio, .book (and IDN equivalent), .broadway, .film, .game, .games, .juegos, .movie, .music, .software, .song, .tunes, .fashion (and IDN equivalent), .video, .app, .art, .author, .band, .beats, .cloud (and IDN equivalent), .data, .design, .digital, .download, .entertainment, .fan, .fans, .free, .gratis, .discount, .sale, .hiphop, .media, .news, .online, .pictures, .radio, .rip, .show, .theater, .theatre, .tour, .tours, .tvs, .video, .zip
- **Professional Services:**
  - .abogado, .accountant, .accountants, .architect, .associates, .attorney, .broker, .brokers, .cpa, .doctor, .dentist, .dds, .engineer, .lawyer, .legal, .realtor, .realty, .vet
- **Corporate Identifiers:**
  - .corp, .gmbh, .inc, .limited, .llc, .llp, .ltda, .ltd, .sarl, .srl, .sal
- **Generic Geographic Terms:**
  - .town, .city, .capital

- .reise, .reisen[5]
- .weather
- .engineering
- .law
- **Inherently Governmental Functions**
    - .army, .navy, .airforce
- In addition, applicants for the following strings should develop clear policies and processes to minimise the risk of cyber bullying/harassment
    - .fail, .gripe, .sucks, .wtf

The GAC further advises the Board:

1. In addition, some of the above strings may require further targeted safeguards, to address specific risks, and to bring registry policies in line with arrangements in place offline. In particular, a limited subset of the above strings are associated with market sectors which have clear and/or regulated entry requirements (such as: financial, gambling, professional services, environmental, health and fitness, corporate identifiers, and charity) in multiple jurisdictions, and the additional safeguards below should apply to some of the strings in those sectors:

6. At the time of registration, the registry operator must verify and validate the registrants' authorisations, charters, licenses and/or other related credentials for participation in that sector.

7. In case of doubt with regard to the authenticity of licenses or credentials, Registry Operators should consult with relevant national supervisory authorities, or their equivalents.

8. The registry operator must conduct periodic post-registration checks to ensure registrants' validity and compliance with the above requirements in order to ensure they continue to conform to appropriate regulations and licensing requirements and generally conduct their activities in the interests of the consumers they serve.

Category 2

<u>Restricted Registration Policies</u>

The GAC advises the ICANN Board:

1. **Restricted Access**
    - As an exception to the general rule that the gTLD domain name space is operated in an open manner registration may be restricted, in particular for strings mentioned under category 1

[5] Austria, Germany, and Switzerland support requirements for registry operators to develop registration policies that allow only travel-related entities to register domain names. Second Level Domains should have a connection to travel industries and/or its customers

above. In these cases, the registration restrictions should be appropriate for the types of risks associated with the TLD. The registry operator should administer access in these kinds of registries in a transparent way that does not give an undue preference to any registrars or registrants, including itself, and shall not subject registrars or registrants to an undue disadvantage.

2. Exclusive Access

- For strings representing generic terms, exclusive registry access should serve a public interest goal.

  - In the current round, the GAC has identified the following non-exhaustive list of strings that it considers to be generic terms, where the applicant is currently proposing to provide exclusive registry access

    - .antivirus, .app, .autoinsurance, .baby, .beauty, .blog, .book, .broker, .carinsurance, .cars, .cloud, .courses, .cpa, .cruise, .data, .dvr, .financialaid, .flowers, .food, .game, .grocery, .hair, .hotel, .hotels .insurance, .jewelry, .mail, .makeup, .map, .mobile, .motorcycles, .movie, .music, .news, .phone, .salon, .search, .shop, .show, .skin, .song, .store, .tennis, .theater, .theatre, .tires, .tunes, .video, .watches, .weather, .yachts, .クラウド [cloud], .ストア [store], .セール [sale], .ファッション [fashion], .家電 [consumer electronics], .手表 [watches], .書籍 [book], .珠宝 [jewelry], .通販 [online shopping], .食品 [food]

ANNEX II

List of questions related to Public Interest Commitments Specifications

1. Could a third party intervene or object if it thinks that a public interest commitment is not being followed? Will governments be able to raise those sorts of concerns on behalf of their constituents?

2. If an applicant does submit a public interest commitment and it is accepted are they able to later amend it? And if so, is there a process for that?

3. What are ICANN's intentions with regard to maximizing awareness by registry operators of their commitments?

4. Will there be requirements on the operators to maximize the visibility of these commitments so that stakeholders, including governments, can quickly determine what commitments were made?

5. How can we follow up a situation where an operator has not made any commitments? What is the process for amending that situation?

6. Are the commitments enforceable, especially later changes? Are they then going into any contract compliance?

7. How will ICANN decide whether to follow the sanctions recommended by the PIC DRP? Will there be clear and transparent criteria? Based on other Dispute Resolution Procedures what is the expected fee level?

8. If serious damage has been a result of the past registration policy, will there be measures to remediate the harm?

Annex 24

Governmental Advisory Committee

Durban, 18 July 2013

GAC Communiqué – Durban, South Africa[1]

I. Introduction

The Governmental Advisory Committee (GAC) of the Internet Corporation for Assigned Names and Numbers (ICANN) met in Durban, South Africa during the week of 13 July 2013. 59 GAC Members and 4 Observers attended the meetings. The GAC expresses warm thanks to the local host, .zadna, for their support.

II. Inter-constituency Activities

1. Briefing from the Geo TLD Registry Group

The GAC met with the Geo TLD Registry Group and received information on the organization's origins, values, missions and current concerns.

2. Meeting with the Accountability and Transparency Review Team 2 (ATRT 2)

The GAC met with the ATRT 2 and discussed expectations and priorities. The GAC encouraged the ATRT2 to give advice on improving the accountability and transparency in ICANN's financial operations reporting. The ATRT2 was invited to advise on how to improve outreach and active participation, especially from developing countries. Broad participation of stakeholders from all regions is vital for the legitimacy of ICANN and the multi-stakeholder model. The GAC also invited the ATRT2 to give advice on how to improve the GAC and the transparency of GAC meetings, and to better explain and provide rationales for the advice of the GAC. The ATRT2 invited individual GAC members to provide further written inputs to the Review Team.

[1] To access previous GAC advice, whether on the same or other topics, past GAC communiqués are available at: https://gacweb.icann.org/display/gacweb/GAC+Recent+Meetings and older GAC communiqués are available at: https://gacweb.icann.org/display/gacweb/GAC+Meetings+Archive.

3. **Meeting with the Generic Names Supporting Organization (GNSO)**

   The GAC met with the GNSO and exchanged views on key policy development work in the GNSO, including an ongoing Policy Development Process (PDP) regarding protection of IGO and INGO names and acronyms. An exchange focused on the opportunities for the GAC to engage early in GNSO Policy Development Processes.

4. **Meeting with the Security and Stability Advisory Committee (SSAC)**

   The GAC met with the SSAC and received an update on recent SSAC work regarding namespace collisions, internal name certificates and dotless domains, and exchanged views on ensuing concerns.

5. **Meeting with the Country Code Names Supporting Organization (ccNSO)**

   The GAC met with the ccNSO and received information about the recently concluded policy development regarding IDN ccTLDs, the modification of the IDN Fast Track process with creation of a second panel and the Framework of Interpretation work. The GAC and the ccNSO also discussed how to further improve the future dialogue between the GAC and the ccNSO.

6. **Meeting with the At-Large Advisory Committee (ALAC)**

   The GAC met with the ALAC and received an introduction to ALAC's organization, bottom-up processes and output, including formal ALAC objections to certain new gTLD applications. The ALAC voiced concerns regarding issues on dot-less domains and domain name collisions and expressed support for recent SSAC statements. The ALAC also expressed concerns over the high threshold in the dispute resolution procedure for Public Interest Commitments (PIC) in particular in relation to the measurable harm standard required to file a complaint and the enforcement of these.

7. **Briefing from the Domain Name Association (DNA)**

   The GAC met with the Domain Name Association and received information on its structure and objectives.

8. **Meeting with the Expert Working Group on gTLD Directory Services (EWG)**

   The GAC met with the EWG and exchanged views on the model proposed by the EWG for the next generation directory service as a successor to the WHOIS service.

The GAC referenced its WHOIS principles from 2007 and its Beijing advice regarding the WHOIS Review Team recommendations, which both have served as input for the work of the EWG. The GAC expressed its concerns about the risks associated with centralized storage of data in one repository in one jurisdiction, and raised a series of issues relating to the proposed data repository structure and access including security, data accuracy, consistency with national law, accreditation of database users, and privacy governance. The GAC looks forward to further discussion of these issues as the working group progresses.

9. **Briefing from Architelos**

The GAC received a briefing on the TLD market and its development from Architelos, a consultancy focused on the domain name industry.

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The GAC warmly thanks the GNSO, the SSAC, the ccNSO and the ALAC, as well as all those among the ICANN community who have contributed to the dialogue with the GAC in Durban.

III. Internal Matters

1. The GAC held its second capacity building session for new and existing members on 13 July, which included an update to the GAC on internationalization and the ICANN's strategy for engagement in the Africa region.
2. The GAC welcomed Madagascar, Namibia, São Tomé and Príncipe, Swaziland, and Zambia to the GAC as members.
3. The chair and vice chairs provided an update in Durban on progress with regard to ACIG providing secretariat support to the GAC.

IV. GAC Advice to the Board[2]

1. **New gTLDs**
    1. **GAC Objections to Specific Applications (ref. Beijing Communiqué 1.c.)**
        a. **The GAC Advises the ICANN Board that:**
            i. The GAC has reached consensus on GAC Objection Advice according to Module 3.1 part I of the Applicant Guidebook on the following applications:[3]

[2] To track the history and progress of GAC Advice to the Board, please visit the GAC Advice Online Register available at: https://gacweb.icann.org/display/GACADV/GAC+Register+of+Advice

[3] Module 3.1: "The GAC advises ICANN that it is the consensus of the GAC that a particular application should not proceed. This will create a strong presumption for the ICANN Board that the application should not be approved.

1. The application for .amazon (application number 1-1315-58086) and related IDNs in Japanese (application number 1-1318-83995) and Chinese (application number 1-1318-5591)
2. The application for .thai (application number 1-2112-4478)

b. guangzhou (IDN in Chinese), shenzhen (IDN in Chinese), .spa and .yun

i. The GAC agrees to leave the applications below for further consideration and **advises the ICANN Board**:

i. Not to proceed beyond initial evaluation until the agreements between the relevant parties are reached.

1. The applications for .spa (application number 1-1309-12524 and 1-1619-92115)
2. The application for .yun (application number 1-1318-12524
3. The application for .guangzhou (IDN in Chinese - application number 1-1121-22691)
4. The application for .shenzhen (IDN in Chinese - application number 1-1121-82863)

2. .wine and .vin (ref. Beijing Communiqué 1.c.)

a. **The GAC advises the ICANN Board that:**

i. The GAC considered the two strings .vin and .wine and due to the complexity of the matter was unable to conclude at this meeting. As a result the GAC agreed to take thirty days additional time with a view to conclude on the matter.

3. .date and .persiangulf (ref. Beijing Communiqué 1.c.)

a. **The GAC has finalised its consideration of the following strings, and does not object to them proceeding:**

i. .date (application number 1-1247-30301)

ii. .persiangulf (application number 1-2128-55439)

4. .indians and .ram

a. The GAC Advises the ICANN Board that:

i. The GAC has noted the concerns expressed by the Government of India not to proceed with the applications for .indians and .ram.

5. Protection of IGO Acronyms

a. The GAC reaffirms its previous advice from the Toronto and Beijing Meetings that IGOs are in an objectively different category to other rights holders thus warranting special protection by ICANN. IGOs perform important global public missions with public funds and as such, their identifiers (both their names and their acronyms) need preventative protection in an expanded DNS.

b. The GAC understands that the ICANN Board, further to its previous assurances, is prepared to fully implement GAC advice; an outstanding matter to be finalized is the practical and effective implementation of the permanent preventative protection of IGO acronyms at the second level.

c. The GAC advises the ICANN Board that:

i. The GAC is interested to work with the IGOs and the NGPC on a complementary cost-neutral mechanism that would:

a. provide notification to an IGO if a potential registrant seeks to register a domain name matching the acronym of an IGO at the second level, giving the IGO a reasonable opportunity to express concerns, if any; and

b. allow for an independent third party to review any such registration request, in the event of a disagreement between an IGO and potential registrant.

ii. The initial protections for IGO acronyms confirmed by the NGPC at its meeting of 2 July 2013 should remain in place until the dialogue between the GAC, NGPC, and IGO representatives ensuring the implementation of preventative protection for IGO acronyms at the second level is completed.

5. Protection of Red Cross/Red Crescent Acronyms

a. The GAC advises the ICANN Board that

i. The same complementary cost neutral mechanisms to be worked out (as above in 4.c.i.) for the protection of acronyms of IGOs be used to also protect the acronyms of the International Committee

of the Red Cross (ICRC/CICR) and the International Federation of Red Cross and Red Crescent Societies (IFRC/FICR).

6. Category 1 Safeguard Advice

i. The GAC has met with the NGPC to discuss the Committee's response to GAC advice contained in the Beijing Communique on safeguards that should apply to Category 1 new gTLDs. **The GAC Advises the ICANN Board that:**

1. The GAC will continue the dialogue with the NGPC on this issue.

7. Geographic Names and Community Applications

a. Geographic Names

i. The GAC recommends that ICANN collaborate with the GAC in refining, for future rounds, the Applicant Guidebook with regard to the protection of terms with national, cultural, geographic and religious significance, in accordance with the 2007 GAC Principles on New gTLDs.

b. Community Applications

i. The GAC reiterates its advice from the Beijing Communiqué regarding preferential treatment for all applications which have demonstrable community support, while noting community concerns over the high costs for pursuing a Community Objection process as well as over the high threshold for passing Community Priority Evaluation.

ii. Therefore the GAC advises the ICANN Board to:

a. Consider to take better account of community views, and improve outcomes for communities, within the existing framework, independent of whether those communities have utilized ICANN's formal community processes to date.

8. DNS Security and Stability

a. The GAC shares the security and stability concerns expressed by the SSAC regarding Internal Name Certificates and Dotless Domains. The GAC requests the ICANN Board to provide a written briefing about:

i. how ICANN considers this SSAC advice with a view to implementation as soon as possible. The GAC believes that all such stability and security analysis should be made publicly available prior to the delegation of new gTLDS.

ii. **The GAC Advises the ICANN Board to:**

a. As a matter of urgency consider the recommendations contained in the SSAC Report on Dotless Domains (SAC053) and Internal Name Certificates (SAC057).

9. **Registry and Registrar Agreements and Conflicts with Law**

   a. It was noted that there are provisions in the Registry Agreement and Registrar Accreditation Agreement that may conflict with applicable law in certain countries, in particular privacy and data retention, collection and processing law. The importance of having adequate procedures to avoid these conflicts was highlighted.

V. Next Meeting

The GAC will meet during the 48th ICANN meeting in Buenos Aires, Argentina.

Annex 25

GAC Early Warning – Submittal Islam-AE-23450

Application ID:	1-2130-23450
Entity/Applicant Name:	Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.
String:	ISLAM
Early Warning Issue Date:	20 November 2012

Early Warning Description – This will be posted publicly:

The government of UAE would like to express its serious concerns toward ".islam" new gTLD application made by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. specifically in the areas highlighted below:

(1) private entity control over sensitive name
(2) Lack of community involvement and support
(3) Sensitivity of the name and domain name use policy

Reason/Rationale for the Warning – This will be posted publicly:

(1) private entity control over sensitive name

Religious terms and subjects are very sensitive areas. The applicant is a commercial entity. Strict boundaries, measures and policies must be set to ensure that applicant business activities do not conflict with the religion objectives, principles, beliefs and laws. Therefore any religious terms must be only applied by a government or not-for-profit organization acting on behalf of that community as oppose to a private entity. It is unacceptable for a private entity to have control over religious terms such as Islam without significant support and affiliation with the community its targeting.

(2) Lack of community involvement and support

The application targets the entire Muslim community. This covers wide range of population (approximately 1.4 to 1.6 Billion). The applicant has presented couple of letter of supports from organizations mostly associated with one country, Iran. However Islam has many schools and branches whose followers spreading over 4 continents. Even within Iran, there are many braches within the country and the support letters does not cover all of them. The support letters presented by the applicant constitute a minority (less than 5% of the community).

If there is lack of support from the majority of the community to this application then this application will most probably be dominated by subgroup from the religion and will ignore the interests of the remaining majority. This will adversely affect the interest of the community to register in the TLD and therefore limit its growth.

Furthermore there is lack of information regarding background and affiliation of the company and its leader. In all cases they will represent the entire Muslim community and hence the support of community is an essential prerequisite and must be in a form of letter from known NGOs and intergovernmental organizations that do represent majority of the community such as the IOC.

(3) Sensitivity of the name and domain name use policy

Religions are extremely sensitive subject. Within religions there are different sub groups and sects who may have many differences and diversities. It is very difficult task to unite all of these differences under one TLD unless it is run and supported by an organization that represent the community or its majority.

As with all religions, Islam has basic principles, pillars, views and law. Anything that would conflict with such principles, pillars, views, believes or law would be unacceptable for the followers and believers of Islam (hence the community) in general which naturally brings issue of registration and use policies. A very important question must be raised as to how the applicant will ensure that the use of the domain name is in line with Islam principles, views and law? These issues will be eliminated if this TLD is supported and supervised by an IGO which represents majority of the community. The application lacks any sort of protection to ensure that the use of the domain names registered under the applied for new gTLD are in line with Islam principles, pillars, views believes and law. There are no clear mechanisms to prevent any abuses related to the above.

For the above reasons, the government of UAE would like to **raise its disapproval and non-endorsement** to this application and request the ICANN and the new gTLD program evaluators to not approve this application.

Possible Remediation steps for Applicant – This will be posted publicly:

The applicant should withdraw their application based on the information provided above

Further Notes from GAC Member(s) (Optional) – This will be posted publicly:

INFORMATION FOR APPLICANTS

About GAC Early Warning

The GAC Early Warning is a notice only. It is not a formalobjection, nor does it directly lead to a process that canresult in rejection of the application. However, a GAC EarlyWarning should be taken seriously as it raises the likelihoodthat the application could be the subject of GAC Adviceon New gTLDs or of a formal objection at a later stage in theprocess. Refer to section 1.1.2.4 of the Applicant Guidebook (http://newgtlds.icann.org/en/applicants/agb) for more information on GAC Early Warning.

Instructions if you receive the Early Warning

ICANN strongly encourages you work with relevant parties as soon as possible to address the concerns voiced in the GAC Early Warning.

Asking questions about your GAC Early Warning

If you have questions or need clarification about your GAC Early Warning, please contact gacearlywarning@gac.icann.org.As highlighted above, ICANN strongly encourages you to contact gacearlywarning@gac.icann.org as soon as practicableregarding the issues identified in the Early Warning.

Continuing with your application

If you choose to continue with the application, then the "Applicant's Response" section below should be completed. In this section, you should notify the GAC of intended actions, including the expected completion date. This completed form should then be sent to gacearlywarning@gac.icann.org.If your remediation steps involve submitting requests for changes to your application, see the change request process at http://newgtlds.icann.org/en/applicants/customer-service/change-requests.

In the absence of a response, ICANN will continue to process the application as submitted.

Withdrawing your application

If you choose to withdraw your application within the 21-day window to be eligible for a refund of 80% of the evaluation fee (USD 148,000),please follow the withdrawal process published at http://newgtlds.icann.org/en/applicants/customer-service/withdrawal-refund. Note that an application can still be withdrawn after the 21-day time period; however, the available refund amount is reduced. See section 1.5 of the Applicant Guidebook.

For questions please contact: gacearlywarning@gac.icann.org

Applicant Response: