

## **APTLD Comments on the Geographical Names – Draft Applicant Guidebook, V.2**

APTLD recognizes the work being undertaken by ICANN staff in developing the Geographical Names Applicant Guidebook and values the opportunity to provide feedback on the Draft Guidebook V.2.

We appreciate the fact that geographical names are being given special consideration in the process. However, APTLD feels strongly that all geographical names that are country and territory names are ccTLDs and should not come within the gTLD process. This applies regardless whether the string being considered is ASCII or non-ASCII script.

Any such geographical names should automatically be considered, if in ASCII script, under existing policies and procedures for ccTLD delegation or, if in non-ASCII script, under the IDN ccTLD Fast Track Process or the IDN ccPDP recommendation, when it is adopted by the Board.

Therefore, we suggest that for the purposes of 2.1.1.4, any and all strings that are representations of names of countries or territories, whether in abbreviated form or by cultural or historical reference, in any language or script, be identified as Categories of Strings Considered Geographical Names and be referred to the relevant ccTLD process rather than be included in the gTLD one.

We hope to see our suggestion reflected in the next draft of the Applicant Guidebook.

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