

**Public Consultation Document:**

**The release of One and Two Letter .ie Domain Names**

**June 9<sup>th</sup> 2015**



This consultation document has been issued by the Policy Advisory Committee of the IE Domain Registry Limited (IEDR), in its capacity as adviser to the board of the company in relation to policy matters. IEDR is the active registry operator of the .ie country code top-level domain (ccTLD) for the island of Ireland.

## Table of Contents

1. Introduction .....	3
1.1 Background .....	3
1.2 What policy changes are being proposed? .....	4
1.3 Invitation to participate in this consultation .....	4
2. Executive Summary .....	5
3. Proposed Release Mechanism – in detail .....	6
3.1 Proposed Sunrise – .....	7
3.2 Proposed Landrush .....	7
3.3 General availability .....	8
4. Release Scenarios – current consensus .....	9
4.1 Phased Approach .....	9
4.2 Auctions - basis for resolving contention among multiple applicants .....	10
4.3 Rights holders’ claim to the name .....	10
4.4 Dispute resolution and Appeals .....	11
5. Participation in the Consultation process .....	11
6. Appendices .....	12
Appendix I .....	12
Appendix II .....	12
Appendix III .....	13
Appendix IV: .....	14
Appendix V: Frequently Asked Questions .....	15

# 1. Introduction

## 1.1 Background

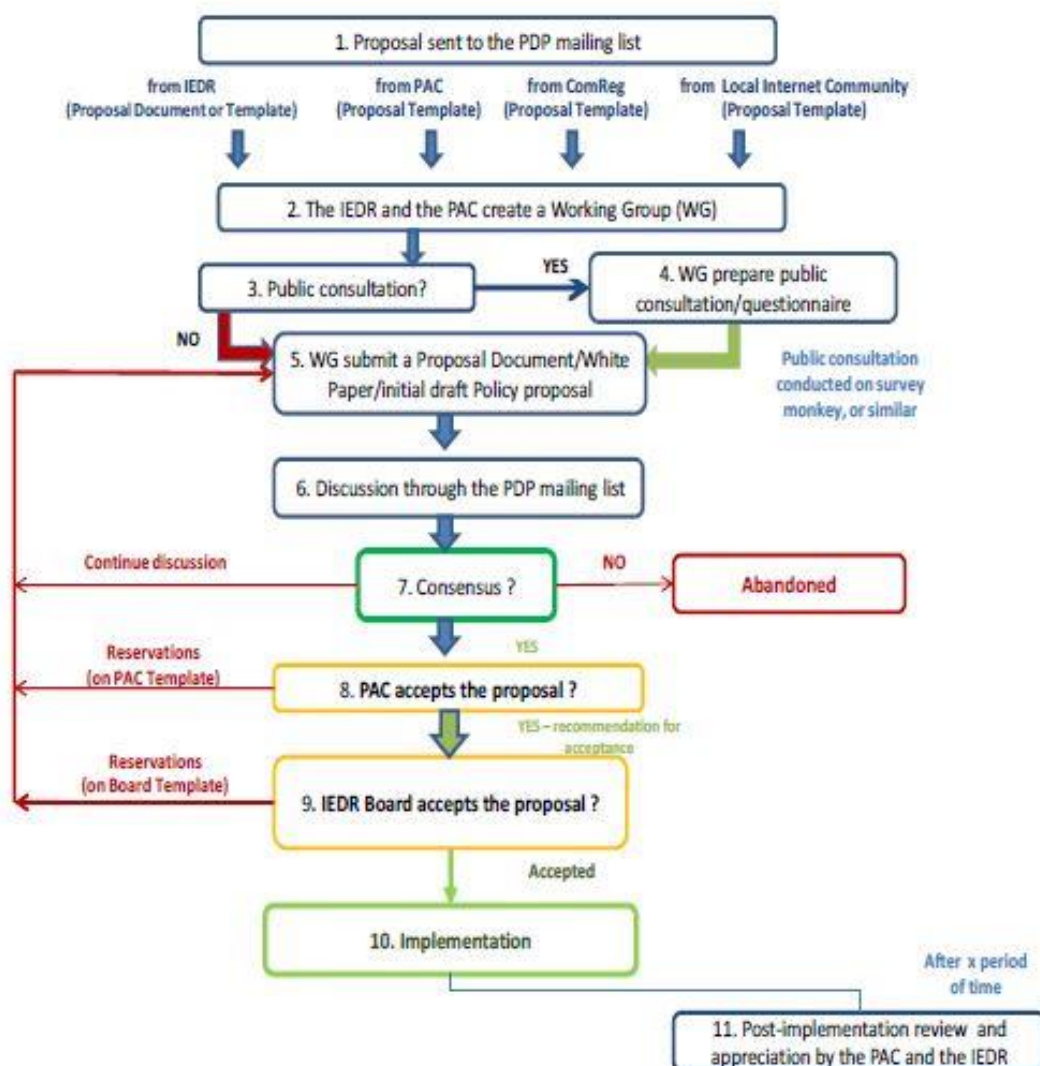
IE Domain Registry Limited (IEDR) is the body responsible for the management of the .ie namespace, ensuring that all applicants for .ie domain names have a verifiable connection to Ireland, and also possess a valid claim to the particular .ie domain they wish to obtain.

The IEDR's mission is to provide unique identifiable Irish domain names, along with registry and related services, to the local and International Internet community.

There is a formal policy development process for the .ie namespace, which was developed by the IEDR, and has been in effect since May 2012.

This policy development process is designed to be bottom-up and consensus-driven, meaning that any stakeholder can request a policy change and, if there is consensus among stakeholders, the policy change can be implemented.

Since its implementation in May 2012, policy change requests have followed this 10 step policy development process (PDP) as outlined below:



In 2014, the IEDR established a Policy Advisory Committee (PAC) to consider and provide advice on policy change requests concerning Ireland's Internet top-level domain, .ie.

The Policy Advisory Committee operates in line with the Policy Development Process (PDP) and consists of stakeholders with a vested interest in the .ie namespace, and its policies. This Committee meets on a regular basis to discuss any proposed policy changes and, where consensus exists to implement a policy change; the PAC works to find the most appropriate release for such changes.

## **1.2 What policy changes are being proposed?**

In February 2015, the PAC recommended that the registration of one and two letter .ie domains should be allowed, and the Registration Policies (specifically - Section 3.1) should be altered to permit this.

The decision to change this policy has come about in response to the particularly high demand for such shortened domains amongst the Internet Community, particularly due to their memorability, which make them a very desirable asset for businesses to market their services.

This recommendation was issued within the context of the decisions and actions of a number of other Country Code Registries (ccTLDs) that released such domains for registration in recent years. In particular, the German Supreme Court ruled that the registration of two letter domains should not be prohibited by the German registry, DENIC.

These one and two letter domain name releases have occurred as a result of the high level of interest in them, and also due to the redundancy of historic technical considerations which resulted in their restriction.

Through the framework of the IEDR's Policy Development Process (PDP), the PAC decided that a Development Group be set up to build consensus on the best way in which to introduce these new domains to the .ie namespace.

After careful consideration, the PAC has decided that a special approach for the release of these shortened domains is necessary, as their release is likely to provoke a high level of demand, and it must be ensured that such a release is fair, equitable, and transparent for the sake of all parties involved. The proposed release methods have been outlined in detail in Section 3. The issues considered are summarised in Section 4 of this document.

## **1.3 Invitation to participate in this consultation**

In light of the work done by the Development Group, along with the PAC and the IEDR, we feel that it is important to ensure as many perspectives as possible are heard, and taken into consideration when reviewing these proposed changes further.

As such, we would like to open discussion on these matters to the public, over a 30 day Consultation period.

During this time, all interested parties are asked to provide any feedback or comments that they feel should be taken into consideration with regard to these proposed policy changes and suggested release mechanisms.

Stakeholders, such as registrants, registrars, the larger internet community (including representatives from the business community, public authorities and consumer organisations) and others, are asked to engage with this process, so that the review of the policy change, and its proposed release mechanisms, can be comprehensive, and ensure consideration for all opinions is taken into account.

If you are happy to do so, please provide a brief note about the type of organisation you represent, or interest you have, when submitting feedback. Please also note that any comments provided may be published in further reports relating to the policy change and its release, however, personal information will be excluded.

We understand that the proposed release will be of great interest to the Internet community, and feel that it is particularly important that the views of all interested parties are taken into account when reviewing the decision further.

**All submissions should be provided to [2-letterconsult@iedr.ie](mailto:2-letterconsult@iedr.ie) between June 9<sup>th</sup> 2015, and July 9<sup>th</sup> 2015.**

A summary report on this consultation's findings will be released after the process has ended, and will summarise the categories of responses received, along with the intended course of action to be taken by the PAC in relation to this feedback.

## 2. Executive Summary

This document outlines the proposed policy change alteration required to permit the registration of one and two letter .ie domain names. (See Appendix IV for full policy change template.)

The proposed “phased” release mechanisms are:

- Sunrise: This will be used to provide trademark holders with the opportunity to register one and two letter .ie domains that correspond to a protected right exactly, which will reduce the likelihood of cybersquatting and brand infringement.

Due to the expected level of demand for these domains, premium pricing will apply (prices to be determined and announced at a later date).

Instances where multiple applications are made for a single domain will be resolved using an auction platform, with trademark holders being granted access by the IEDR Registrations Department, once their eligibility has been verified.

- Landrush: All interested parties, provided they are eligible under the IEDR Registration Policies, will be permitted to register any remaining one or two letter domains prior to General Availability.

Due to the expected level of demand for these domains, premium pricing will apply (prices to be determined and announced at a later date).

Instances where multiple applications are made for a single domain will be resolved using an auction platform, with eligible applicants being granted access by the IEDR Registrations Department, once their eligibility has been verified.

- **General Availability:** Once Landrush has been fully completed, any remaining one and two letter .ie domains will be released on a “First Come First Served” basis, as per normal registration procedures within the IEDR. All applicants are required to satisfy the registration criteria, e.g. provide proof of identity / trading, connection to Ireland, and claim to the domain.

### 3. Proposed Release Mechanism – in detail

It is proposed to alter the Registration Policy to allow for the registration of one and two letter .ie domains, as there are no longer any technical, administrative, policy or legal reasons for this restriction remaining in effect.

Accordingly, the following domains are planned to be released:

- All one character / letter domains currently reserved in .ie
- All two letter domains currently reserved in .ie

#### **Exception:**

- The IEDR, through its responsibilities of managing the .ie namespace, will restrict a small number of these one and two letter domains from registration, on the grounds that they may be used for future commercial use by the Registry, or on the basis that their registration would cause confusion within / mislead the Internet community.
- In addition, a number of restrictions will apply to the registration of two letter .ie domains which correspond to ccTLDs. These restrictions will apply to the re-sale of such domains, and the use of sub-domains.

Given the expected demand for many of these domains, primarily due to their intrinsic value and attractiveness as a result of their memorability, it is proposed to have a controlled, phased, release mechanism, as outlined below:

- **Sunrise:** Applications will be accepted from holders of registered trademarks, which must be identical to the one / two letter combination being applied for. Premium pricing will apply with prices to be determined and announced at a later date.

- **Landrush:** Domain names not taken up in the first round will then be open to all interested parties who can satisfy the IEDR Registration Policies. Premium pricing will apply (prices to be determined).
- **General Availability:** Domain names not taken up in the earlier phases will then be open to the general public.

### 3.1 Proposed Sunrise –

- **Timeframe** - Sunrise will begin on a “to be determined” date, and finish 30 days later.
- **Eligibility** –
  - Holders of the following trademarks will be accepted under this phase;
    - Irish trademarks,
    - Community trademarks,
    - International trademarks designating Ireland or those held by a company which shows an Irish registrant address on the trademark database.
  - All applicants will be required to provide a copy of their trademark certificate / trademark number, which will be verified by the IEDR’s Registrations Department.
  - Every applicant must hold rights to exactly the same name as the domain name that they wish to register.
  - All rights must have been obtained prior to July 30th, 2014.
- **Conditions** –
  - A number of restrictions will apply to the registration of two letter .ie domains which correspond to ccTLDs. These restrictions will apply to the re-sale of such domains, and the use of sub-domains.
- **Pricing** – To be determined and announced at a later stage.
- **Contention Resolution** – Where a domain has more than one eligible applicant, an auction process will take place with the highest bidder gaining the right to use the domain.

### 3.2 Proposed Landrush

- **Timeframe** – Landrush will begin when Sunrise has been completed, on a “to be decided” date and will finish 30 days later.
- **Eligibility** –

- During this period, all interested applicants that satisfy the registration criteria of the IEDR (e.g. must provide proof of identity/ trade, connection to Ireland and claim to the domain) may apply for these shortened domain names, provided it was not already registered during the Sunrise Phase.
- All applicants will be required to authenticate their claim to the name and show their real and substantive connection to Ireland, which will be verified by the IEDR's Registrations Department.
- **Conditions** –
  - A number of restrictions will apply to the registration of two letter .ie domains which correspond to ccTLDs. These restrictions will apply to the re-sale of such domains, and the use of sub-domains.
- **Pricing** – To be determined and announced at a later time.
- **Contention Resolution** - Where a domain has more than one eligible applicant, an auction process will take place with the highest bidder will gain the right to use the domain.

### 3.3 General availability

Once the initial Sunrise and Landrush periods have ended, the principle of “First Come First Served” will be used for the release of one and two letter domains to the general public.

- **Timeframe** – General Availability will begin when Landrush has fully completed, on a “to be determined” date and will be the final phase of release.
- **Eligibility** –
  - During this period, the general public can apply for one and two letter domains that were not registered during earlier rounds.
  - All applicants will be required to authenticate their claim to the name and show their real and substantive connection to Ireland, which will be verified by the IEDR's Registrations Department.
- **Conditions** –
  - A number of restrictions will apply to the registration of two letter .ie domains which correspond to ccTLDs. These restrictions will apply to the re-sale of such domains, and the use of sub-domains.
- **Pricing** –
  - Applications submitted via an accredited .ie Registrar will have costs set by the Registrar.



- Registration costs for direct customers of the IEDR will be confirmed at a later date.
- **Contention Resolution** – None: Applications will be processed on a First Come First Served basis, with the usual 27 days allowed to complete the registration requirements. Only one application for a domain can be received by the system at a time.

## 4. Release Scenarios – current consensus

The recommendations set out above have been arrived at after generating consensus amongst the PAC's eligible organisations on many release related issues, the most important of which include:-

- Phased release mechanism, or the use of a onetime only “big bang release”
- Basis for resolving contentions between multiple applicants
- Rights holder's claim to a name
- Dispute resolution mechanisms

The reasoning and decision criteria considered are set out in the PAC meeting minutes, available to download from the IEDR's website, [here](#).

### 4.1 Phased Approach

On the basis of discussions amongst the PAC and the Development Group to date, there was consensus that a “phased” registration process was the most appropriate mechanism for the launch of one and two letter .ie domains, and this will be actioned on a cost recovery basis. The aim of this approach is to ensure the release is fair, equitable and transparent for all stakeholders.

It is proposed that the first registration period will be solely for trademark holders, allowing them to obtain domains that reflect their trademark name **exactly**. This process will be known as Sunrise. This decision is in line with international best common practices for TLD's.

#### **Sunrise Phase**

The Sunrise Phase is expected to run for a period of 30 days, during which time no applications will be rejected, e.g. - all applications will be initially received, evaluated and replied to.

It is hoped that this phased method of release will reduce the likelihood of disputes arising after registration, as those with a registered and protected right will have the opportunity to protect their brand from infringement before such domains are released on a General Availability basis.

## **Landrush Phase**

It is proposed that the second registration period will be open to all interested applicants who can satisfy the registration criteria of the IEDR. This process will be known as Landrush.

This Phase is expected to run for a period of 30 days after Sunrise has been fully completed, during which time no applications will be rejected, e.g. - all applications will be initially received, evaluated and replied to.

All applicants will need to provide the relevant supporting documentation to satisfy the registration criteria during the allocated time period.

### **4.2 Auctions - basis for resolving contention among multiple applicants**

In cases where multiple applicants apply for a single domain name during the Sunrise or Landrush periods, these instances will be resolved by the use of an auction process, which will be used to determine the successful registrant of the domain. This decision is in line with international best common practices for TLD's.

Eligible applicants, e.g. those that hold a trademark which corresponds to the exact domain name being applied for, will be provided with access to the auction, most likely via a code issued by the Registrations Department in the IEDR, after the applicant has satisfied the registration criteria.

This method will allow the most “motivated” applicants to obtain the one or two letter domain during Sunrise or Landrush, and any additional funds raised via this process will be given to a worthy internet cause in Ireland, after related auction setup fees have been covered.

**NOTE:** Post-auction issues are not expected, as applicants will have already undergone pre-authentication of their claims.

### **4.3 Rights holders' claim to the name**

#### **Trademarks to be accepted under the Sunrise Period**

The following trademarks will be accepted during Sunrise:

- Irish Trademarks
- Community Trademarks
- Trademarks designated for Ireland or those held by Irish / Northern Irish Companies:  
In order to be considered eligible under this, the trademark must clearly be designated for use within Ireland, or the trademark holder address on the trademark certificate / database must reflect a physical Irish postal address.

## 4.4 Dispute resolution and Appeals

The release mechanism set out above is designed to minimise the potential for disputes. Specifically, all applicants will have demonstrated their real and substantive connection to the island of Ireland, and evidenced a claim to the .ie domain name. In addition, .ie domains registered during the Sunrise Phase will have evidenced additional legal rights.

As the IEDR does not operate an informal dispute resolution process, appeals against a registration can be submitted to the World Intellectual Property Organisation (WIPO), under the terms and conditions of the IE Dispute Resolution Process – see <https://www.iedr.ie/dispute-resolution/> .

A complainant will have to prove that:-

- a .ie domain name is identical or misleadingly similar to a protected identifier in which the Complainant has rights; and
- the Registrant has no rights in law or legitimate interests in respect of a .ie domain name; and
- a .ie domain name has been registered or is being used in bad faith.

Complaints are not decided on by the IEDR, but by an independent and impartial panel of one to three experts appointed by the World Intellectual Property Organisation (WIPO).

## 5. Participation in the Consultation process

The Public Consultation period is now open, and will run for 30 days until July 9th, 2015.

All comments and feedback relating to the proposed policy change are welcome, and should be submitted to the following mailbox:

[2-letterconsult@iedr.ie](mailto:2-letterconsult@iedr.ie)

All interested parties are asked to engage with this process, so that the review of the policy change and its proposed release mechanisms can be comprehensive, and ensure consideration for all opinions is taken into account during the decision making process.

If you are happy to do so, please also provide a brief note about the type of organisation you represent, or interest you have, when submitting feedback. Please also note that any comments provided may be published in further reports relating to the policy change and its release, however, personal information will be excluded.

## 6. Appendices

### Appendix I

All possible two letter combinations are listed in the table below.

AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO	AP	AQ	AR	AS	AT	AU	AV	AW	AX	AY	AZ
BA	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL	BM	BN	BO	BP	BQ	BR	BS	BT	BU	BV	BW	BX	BY	BZ
CA	CB	CC	CD	CE	CF	CG	CH	CI	CJ	CK	CL	CM	CN	CO	CP	CQ	CR	CS	CT	CU	CV	CW	CX	CY	CZ
DA	DB	DC	DD	DE	DF	DG	DH	DI	DJ	DK	DL	DM	DN	DO	DP	DQ	DR	DS	DT	DU	DV	DW	DX	DY	DZ
EA	EB	EC	ED	EE	EF	EG	EH	EI	EJ	EK	EL	EM	EN	EO	EP	EQ	ER	ES	ET	EU	EV	EW	EX	EY	EZ
FA	FB	FC	FD	FE	FF	FG	FH	FI	FJ	FK	FL	FM	FN	FO	FP	FQ	FR	FS	FT	FU	FV	FW	FX	FY	FZ
GA	GB	GC	GD	GE	GF	GG	GH	GI	GJ	GK	GL	GM	GN	GO	GP	GQ	GR	GS	GT	GU	GV	GW	GX	GY	GZ
HA	HB	HC	HD	HE	HF	HG	HH	HI	HJ	HK	HL	HM	HN	HO	HP	HQ	HR	HS	HT	HU	HV	HW	HX	HY	HZ
IA	IB	IC	ID	IE	IF	IG	IH	II	IJ	IK	IL	IM	IN	IO	IP	IQ	IR	IS	IT	IU	IV	IW	IX	IY	IZ
JA	JB	JC	JD	JE	JF	JG	JH	JI	JJ	JK	JL	JM	JN	JO	JP	JQ	JR	JS	JT	JU	JV	JW	JX	JY	JZ
KA	KB	KC	KD	KE	KF	KG	KH	KI	KJ	KK	KL	KM	KN	KO	KP	KQ	KR	KS	KT	KU	KV	KW	KX	KY	KZ
LA	LB	LC	LD	LE	LF	LG	LH	LI	LJ	LK	LL	LM	LN	LO	LP	LQ	LR	LS	LT	LU	LV	LW	LX	LY	LZ
MA	MB	MC	MD	ME	MF	MG	MH	MI	MJ	MK	ML	MM	MN	MO	MP	MQ	MR	MS	MT	MU	MV	MW	MX	MY	MZ
NA	NB	NC	ND	NE	NF	NG	NH	NI	NJ	NK	NL	NM	NN	NO	NP	NQ	NR	NS	NT	NU	NV	NW	NX	NY	NZ
OA	OB	OC	OD	OE	OF	OG	OH	OI	OJ	OK	OL	OM	ON	OO	OP	OQ	OR	OS	OT	OU	OV	OW	OX	OY	OZ
PA	PB	PC	PD	PE	PF	PG	PH	PI	PJ	PK	PL	PM	PN	PO	PP	PQ	PR	PS	PT	PU	PV	PW	PX	PY	PZ
QA	QB	QC	QD	QE	QF	QG	QH	QI	QJ	QK	QL	QM	QN	QO	QP	QR	QS	QT	QU	QV	QW	QX	QY	QZ	
RA	RB	RC	RD	RE	RF	RG	RH	RI	RJ	RK	RL	RM	RN	RO	RP	RQ	RR	RS	RT	RU	RV	RW	RX	RY	RZ
SA	SB	SC	SD	SE	SF	SG	SH	SI	SJ	SK	SL	SM	SN	SO	SP	SQ	SR	SS	ST	SU	SV	SW	SX	SY	SZ
TA	TB	TC	TD	TE	TF	TG	TH	TI	TJ	TK	TL	TM	TN	TO	TP	TQ	TR	TS	TT	TU	TV	TW	TX	TY	TZ
UA	UB	UC	UD	UE	UF	UG	UH	UI	UJ	UK	UL	UM	UN	UO	UP	UQ	UR	US	UT	UU	UV	UW	UX	UY	UZ
VA	VB	VC	VD	VE	VF	VG	VH	VI	VJ	VK	VL	VM	VN	VO	VP	VQ	VR	VS	VT	VU	VV	VW	VX	VY	VZ
WA	WB	WC	WD	WE	WF	WG	WH	WI	WJ	WK	WL	WM	WN	WO	WP	WQ	WR	WS	WT	WU	WV	WW	WX	WY	WZ
XA	XB	XC	XD	XE	XF	XG	XH	XI	XJ	XK	XL	XM	XN	XO	XP	XQ	XR	XS	XT	XU	XV	XW	XX	XY	XZ
YA	YB	YC	YD	YE	YF	YG	YH	YI	YJ	YK	YL	YM	YN	YO	YP	YQ	YR	YS	YT	YU	YV	YW	YX	YY	YZ
ZA	ZB	ZC	ZD	ZE	ZF	ZG	ZH	ZI	ZJ	ZK	ZL	ZM	ZN	ZO	ZP	ZQ	ZR	ZS	ZT	ZU	ZV	ZW	ZX	ZY	ZZ

All possible one letter domains are listed in the table below.

<b>A</b>	<b>F</b>	<b>K</b>	<b>P</b>	<b>U</b>	<b>Z</b>
<b>B</b>	<b>G</b>	<b>L</b>	<b>Q</b>	<b>V</b>	
<b>C</b>	<b>H</b>	<b>M</b>	<b>R</b>	<b>W</b>	
<b>D</b>	<b>I</b>	<b>N</b>	<b>S</b>	<b>X</b>	
<b>E</b>	<b>J</b>	<b>O</b>	<b>T</b>	<b>Y</b>	

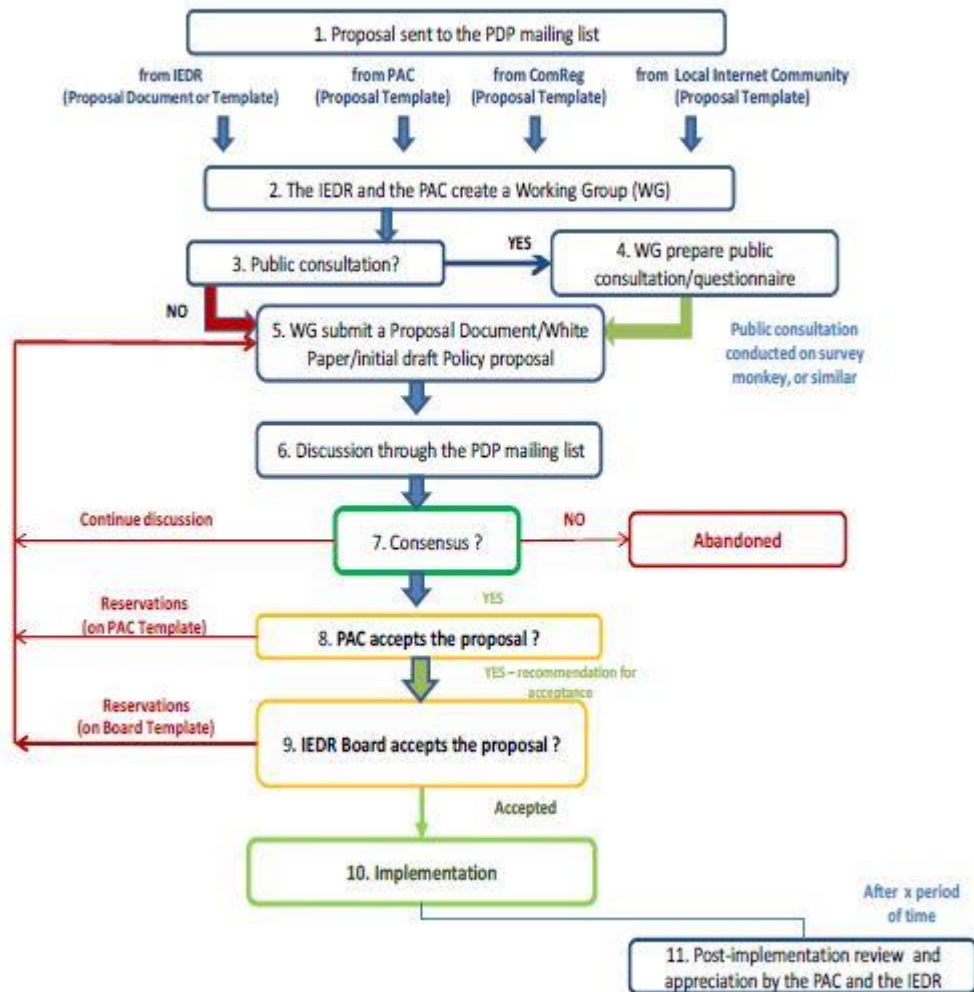
**Note:** A small number of one and two letter .ie domains will be restricted by the IEDR as outlined in this document – on the grounds of possible future commercial use by the Registry, and to avoid confusion amongst the Internet Community.

### Appendix II

A list of PAC members and their “eligible organisations” can be found in the Policy Advisory Committee Terms of Reference, available [here](#).

## Appendix III

The Policy Development Process of the .ie namespace is illustrated as follows:



Further information on the PDP is available [here](#).

## Appendix IV:

Policy Change Template submitted to PAC for review relating to permitting the registration of one and two letter domains.

Policy Change Proposal	
1	<p><b>Proposal Originator</b></p> <p>David Curtin, CEO, IEDR</p>
2	<p><b>Date</b> 3<sup>rd</sup> February 2015</p>
3	<p><b>Policy Proposal Name:</b> To permit one &amp; two (1 &amp; 2) letter domains</p>
4	<p><b>Policy Proposal type:</b> Modify existing policy</p>
5	<p><b>Purpose and benefits of the proposal :</b></p> <p><i>Please state the benefits of your proposal</i></p> <ul style="list-style-type: none"> <li>➤ To release an outdated restriction on the registration of one and two letter .ie domains.</li> <li>➤ A policy relaxation will make available desirable short name .ie domains for registrants.</li> </ul>
6	<p><b>Please indicate any perceived problems (issues you envisage)</b></p> <ul style="list-style-type: none"> <li>➤ IEDR does not envisage objections to the relaxation of the policy per se.</li> <li>➤ There are alternative scenarios for the scheduling of the release for registration and this could generate some alternative preferences from stakeholders eg the operation, or duration, of a sunrise period.</li> <li>➤ There are likely to be competing claims to the limited number of domain names and there will need to be consensus on an appropriate mechanism – other registries have used a lottery, an auction process or first-past-the-post method.</li> </ul>
7	<p><b>Policy proposal grounds:</b> <i>please indicate the reasons for your proposal (what is wrong/missing/inadequate etc. with the status quo?)</i></p> <ul style="list-style-type: none"> <li>➤ There is no longer any technical issue/reason to retain the restriction on two letter domains.</li> <li>➤ Following the VW.de Supreme Court case in Germany, many registries around Europe are now releasing two letter domains, previously prohibited from registration.</li> <li>➤ There is evidence that customers desire these shorter, two letter domains.</li> </ul>
8	<p><b>Policy term proposal:</b> Permanent</p>
9	<p><b>Policy statement/text:</b></p> <p><i>Current Policy Text (if modification):</i> Section 3.1 of the Naming Policy states, inter alia, that “IEDR will not accept the following domain names for registration.</p> <ul style="list-style-type: none"> <li>➤ .....</li> <li>➤ Names of less than two (2) or more than sixty-three (63) characters;</li> <li>➤ Names with two letters;</li> <li>➤ Names which consist exclusively of an alpha -2 country code;</li> <li>➤ .....</li> </ul> <p><i>New Policy Text</i></p> <p>The second two bullet points above would be removed from the Naming Policy, if there is stakeholder consensus on this policy change request.</p>

## Appendix V: Frequently Asked Questions

### **What are two letter domains?**

Two letter domains are shortened domain names, where the use of two letters only is permitted before the .ie extension, e.g. hp.ie.

Such domains are not currently permitted under the registration policies of the IEDR, however, if this policy change is implemented, this will open up with up to 676 two letter .ie domains becoming available for registration.

These domains are usually in great demand as they are particularly easy to remember and a great asset for businesses who need a memorable domain to market their work online.

Whilst the registration of two letter domains is not permitted, the registration of two character domains (e.g. 01.ie) and domains consisting of one letter and one character (e.g. a1.ie), are currently permitted.

### **What is the current situation, and why were these domains restricted until now?**

The decision to remove the restriction on the registration of one and two letter domains was taken in light of the following:

- The technical barriers which previously led to the restriction on their registration are no longer a relevant issue.
- A number of other namespaces at the Country Code level (ccTLDs) have begun to allow the registration of such domains. In particular, the German Supreme Court ruled that the registration of two letter domains should not be prohibited by the German registry, DENIC, which resulted in the release of all two letter domains in the .de namespace.
- The sustained and strong demand for these domains, amongst the Internet community.

### **What changes are proposed happening?**

Section 3.1 of the IEDR Naming Policy will be altered to permit the registration of one and two letter domain names, which are currently prohibited. (It should be noted that the registration of two character .ie domain names is already permitted).

The IEDR Naming Policy is outlined at the following URL:

<https://www.iedr.ie/p30/naming-policy/>

### **Why should I apply for a one or two letter .ie domain name?**

A .ie Domain Name:

- Lets customers know that you are identifiably Irish,
- Is managed - provides your customers with the confidence and knowledge that they know who they are doing business with.
- Is safe - one of the safest namespaces in the world, with lower instances of cybercrime and cybersquatting than other domains extensions.

With .com domains, anybody can register any domain name they choose, provided it is not already taken. In contrast, .ie requires a connection with the island of Ireland, along with a legitimate claim to the domain name being applied for.

Every .ie registration is checked by the IEDR's Registration Services Team to ensure that all applicants meet our requirements.

**One and two letter .ie domain names** will be in particularly high demand amongst the Internet community, due to their memorability, which is a great asset when marketing your business online.

Also, the very limited supply of these domains will further add to their desirability and demand.

### **How can I apply for a one or two letter .ie domain name?**

In due course, applications will be accepted via the same channels .ie domain name requests are currently received – through any accredited .ie Registrar, or as a last resort, directly through the IEDR.

Further information on the current registration process can be found at the following URL:

<https://www.iedr.ie/register-a-domain/how-to-register-a-ie-domain/>

### **How will these domains be made available, and when can I apply?**

One and two letter .ie domain names will be released on a “phased” basis, depending on certain registration criteria.

The three stages will be:

1. Sunrise Phase
2. Landrush Phase
3. General Availability

### **What is Sunrise?**

The initial registration period will be known as a **Sunrise Phase**, and this will run for 30 days. This phase is expected to launch in August / September 2015, during which time Trademark Holders will be given the opportunity to apply for the one or two letter .ie domain name that matches their protected right / trademark **exactly**.



## **What Trademarks will be accepted?**

Trademarks accepted under Sunrise will include:

- Community Trademarks,
- Irish Trademarks,
- Trademarks assigned to companies registered within the Republic of Ireland or Northern Ireland, e.g. in order to proceed on these grounds, the address for the trademark holder on the trademark certificate / database must reflect an address within the island of Ireland.

## **What happens if multiple applications are received for a single domain name during Sunrise?**

In cases where more than one eligible trademark holder applies for a particular domain name during Sunrise, the matter will be decided by **auction** amongst the eligible parties. The auction will be operated by an independent Auction house, and the winning / highest bidder will be the successful registrant.

## **What if I don't have a trademark but want to protect a particular one or two letter domain name?**

If you do not hold a trademark that corresponds exactly to the one or two letter .ie domain you wish to obtain, you can still apply for that domain during the **Landrush or General Availability Phases**, provided the domain isn't registered by another applicant during an earlier phase.

## **What is Landrush?**

**Landrush Phase** will begin after the Sunrise Period has been fully completed, and will run for 30 days also.

This phase will allow for all interested parties to apply for these premium value domains, prior to their release on a "First Come First Served" basis under the General Availability Phase.

Landrush is expected to begin in September / October 2015, and all applicants will be required to satisfy the registration criteria, e.g. provide proof of trading, connection to Ireland, and claim to the domain being applied for. Further information on the current registration criteria is available at:

<https://www.iedr.ie/register-a-domain/document-requirements/>

## **What happens if multiple applications are received for a single domain name during Landrush?**

In cases where more than one applicant applies for a particular domain name during Landrush, the matter will be decided by **auction** amongst the various applicants.

These applicants must submit all of the requested, relevant supporting documentation within the allocated time frame, and satisfy the registration criteria, in order to be considered eligible to participate in the auction process.

The auction will be carried out by an independent Auction house and the winning / highest bidder will be the successful registrant.

## **Why is the domain I want so expensive?**

The registration of one and two letter domain names will be charged at a premium price due to the limited availability of these domains, and the demand that exists for them amongst the Internet community, particularly as a result of their memorability.

In recent years, such domains have been purchased for extremely large sums of money, such as mi.com which was sold for \$3.6 million (€3.2 million) in 2014 to Chinese company, Xiaomi.

Similarly, Facebook purchased the fb.com and fb.co.uk domain names for \$8.5 million (€7.5 million) and £19,500 (€26,500) respectively.

Afnic, the Registry for .fr, recently launched two letter domains, and set pricing at the launch of their Landrush period at €15,000.

As this premium pricing has become a standard industry practice, implemented by other Registries during similar domain name releases, it has been agreed that such pricing will also apply for the release of these shortened one and two letter .ie domains.

## **Can I sell the two letter domain in the future, if I don't want it anymore?**

The PAC has recommended to the board of the IEDR that the current policy should be changed to permit .ie domain names to be sold in the aftermarket/secondary market. Until the policy change has been approved by the board, it will not be possible to sell the right to use a one or two letter domain.

## **What will happen with the auction sale proceeds?**

It is expected that the organisation, marketing and setup of the auction facility, with an auction platform, will be costly as fees or commissions will apply. Funds from auction sales will initially cover these costs. Any surplus auction proceeds will ring fenced and will be

gifted to worthy Internet causes such as education, closing the digital divide, relief of financial hardship or protection of Irish citizens in the area of the Internet.

### **Why are some one and two letter domain names restricted from registration?**

The IE Domain Registry Limited, through its responsibilities of managing the .ie namespace, intends to restrict the release of a small number of one and two letter .ie domain names on the grounds of possible commercial use by the Registry in future, or on the basis that the registration of such domains could be misleading to the Internet community, or cause confusion / damage the credibility and reputation of the Registry.

### **What can I do if the domain I require was registered in an earlier stage of release?**

As all registrants are required to provide relevant supporting documentation during the application process to verify their claim on a domain, along with their connection to Ireland and proof of identity / trading, all .ie domains are registered in accordance with our policies. As such, the IEDR does not use an informal process for dispute resolutions.

However, in cases where a party believes that a .ie domain name was registered incorrectly, in bad faith or infringes upon a protected right, a complaint can be lodged to the World Intellectual Property Organisation (WIPO), however, the Complainant must be able to show that he or she has a right to the domain and the incumbent Registrant does not.

It should be noted that complaints are not decided on by the IEDR, but by an independent and impartial panel of one to three experts appointed by the World Intellectual Property Organisation (WIPO).

Further information on the Dispute Resolution Process can be found at the following URL:

<https://www.iedr.ie/dispute-resolution/>

### **How can I participate in the Public Consultation process?**

The Public Consultation process is now open, and will run for a period of 30 days from June 9<sup>th</sup>, 2015 until July 9<sup>th</sup>, 2015.

All comments and feedback are welcome, and should be submitted to the following email mailbox:

[2-letterconsult@iedr.ie](mailto:2-letterconsult@iedr.ie)