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ICANN's view on singular/plural TLDs

VIA Electronic Delivery

Tencent Group provides world's leading social, gaming, and entertainment platforms for billions of users worldwide. We are a beneficiary of the ever-evolving Internet and the DNS. Being an active advocate for issues related to consumer trust and safety on the Internet, Tencent believes that a stable and reliable brand presence online delivered by the DNS is extremely crucial for us.

We appreciate ICANN's mission to promote choice and competition via the new gTLD program, which we participated back in 2012. On the other hand, it has become more challenging for us to understand on the how successful the program is, and how ICANN measures its success in the future. Specifically, we still have challenge to understand the co-exist of a both singular and plural TLDs in the root, for example, .game vs. .games, .car vs. .cars . One key question is that how ICANN considers such arrangement (allowing singular and plural TLDs to co-exist) helps build a stable and reliable online environment for the registrants and the users they serve. So far we have difficulty to find any rational to support ICANN's approach.

We believe that ICANN should provide a timely update to its community and the general public on measuring the success of delegation of singular / plural TLDs. The current decision was already inconsistent with 2007 GNSO's recommendation that "new generic top-level domain strings must not be confusingly similar to an existing TLD or a reserved name", as well as 2013 GAC Beijing communique. ICANN should immediately act upon it for the benefit of existing registrants who registered both singular and plural TLDs, like Tencent and many globe brands, and for the benefit of the subsequent round new gTLD applicants.

We also recommend that ICANN, for its on-going design of the subsequent round procedure, not only to incorporate the factor of string similarity continuously, but also to emphasize the social cost factor (i.e. cost and increased confusion shouldered on registrant) in a fact-based approach. For example, a trademark owner of the mark "game", who also seeks to brand protection of domain name, has to get registration of the following names to claim the right based on the trademark:

game.games
games.game
game.game
games.games
wwwgame.games
wwwgames.game
wwwgame.game
wwwgames.games

If any of the above names was preemptively registered by others or was missed to be protected by the trademark owner him / herself, the misidentification among users may occur, and to remedy such

confusion via post-registration procedure has been proven costly and time consuming.

Tencent has difficulty to understand why the singular / plural TLD exists, and it is even more difficult for our domain managers to explain and build use cases around these confusing TLDs. The names varies by prices with little difference in terms of appearance, but have the same function on the DNS. They kidnap our brand protection budget, and does not create additional value neither for our brands nor for our users. We believe that it is a shared concern among brand owners in China and across the globe.

We strongly encourage ICANN Board to perform immediate review of the singular / plural status, and provide update to the community with its current view. The review should be proceeded in a neutral manner, meaning the actual registrants of singular / plural domains should have equal input as the contracted registries and ICANN itself. Until such review is completed, ICANN should NOT allow plural form of TLD based on the delegated TLD in singular form (for example, .link vs. links, .club vs. clubs). Furthermore, ICANN should only allow one of the two forms existing in the root for subsequent round application, and to structure possible mechanism to retire the singular / plural TLD pair upon renewal of perspective registry contracts.



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