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Ref : TRA/DG/O/9741

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New gTLD Application “.PERSIANGULF”

Dear Mr. Chehade,

This has reference to the new gTLD Application “.persiangulf” (“Application”) by Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti (“applicant”) and to TRA’s letter ref (TRA/DG/EDPP/6234) dated 14 October 2012 and addressed to ICANN Chairman on the same subject.

I also refer to the GCC Telecom Council Minsters Meeting held on 11 June 2014 in Kuwait City where this subject was raised and discussed.

I would like to firstly thank the ICANN for its commitments toward ensuring the sustainability and resilience of the Internet. The new gTLD programs was built to cater for new opportunities and innovation in the Internet while continuing to ensure security and stability of the Internet and ensuring that it meets expectation of the Internet community.

To this end, on behalf of the GCC countries, the UAE TRA would like to continue to raise its concern against the Application “.persiangulf” which impacts the Internet community in the GCC region.

We would like to highlight that:

- (1) The applied for new gTLD is problematic and refers to a geographical place with disputed name.**
- (2) There is Lack of community involvement and support from significant portion of the community (supported by the panel determination in the formal community-based objection against this Application), and**

(3) GCC countries, GCC secretariat and League of Arab States have raised official objection letters to ICANN against this Application.

While the TRA and the GCC has followed all the processes that were established by ICANN for the new gTLD program however it unfortunate to see that the Application is still continues to progress.

While the GAC did not issue an advice objecting against the Application (due to lack of consensus because one particular country did not agree to the objection), this does not mean those countries which are port of the community targeted by the Application are agreeing to the Application to proceed and this certainly does not mean that ICANN should ignore this fact and continue to allow the Application to proceed.

In this letter I would like to highlight one important issue in addition to the concerns raised previously:

- **Application sustainability and growth:** ICANN in building the new gTLD have put strict requirements and criteria to ensure that Applications are sustainable and made in the interest of the greater Internet community. The security, functionality and stability of Internet rely greatly on a successful operation of the DNS system. It is worrying to see how a TLD being opposed by majority of the community targeted would be able to operate and sustain. We believe the motive behind this Application has nothing to do with Internet community interest, nor commercial interest. We request ICANN to analyze the Application from financial and sustainability angle given that the community continues to oppose the Application. If the TLD is not expected or meant to serve the community being targeted then we believe the TLD would eventually fail and would not sustain financially.

For the above reasons, we would like to **reiterate its strong opposition against** this Application and request the ICANN and the new gTLD program evaluators to not allow this Application to progress.

Best Regards,



Mohammed Al Ghannim
Director General

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