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.

…

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:

<u>INFORMATION FOR APPLICANTS</u>

<u>About GAC Early Warning</u>

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.

<u>Instructions if you receive the Early Warning</u>

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.

<u>Withdrawing your application</u>

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: