



Public Comment Report

Proposed Amendments to Registrant Eligibility Policies for .BANK and .INSURANCE

Prepared by: Heather Diaz, Sr. Director, Compliance and Policy Email: fTLD@fTLD.com

Public Comment Dates

Publication Date: Jul 25, 2019

Close Date: August 24, 2019

Report Date: August 30, 2019

Important Links

Announcements: fTLD.COM;
[REGISTER.BANK](#), [REGISTER.INSURANCE](#)

Public Comment Proceeding: [Posting & View Comments Submitted](#)

I. Overview of the Public Comment Proceeding

fTLD Registry Services (fTLD) held this Public Comment Proceeding to seek comments on Proposed Amendments to the Registrant Eligibility Policies for .BANK and .INSURANCE. The purpose of these Proposed Amendments is to clarify and provide transparency and predictability to those seeking to register .BANK or .INSURANCE domain names. These Proposed Amendments are the result of consultations with fTLD's [Advisory Council](#) (the "Council") and its Board of Directors (the "Board").

In this Report, fTLD has considered and/or addressed all comments received during this Public Comment Proceeding.

II. Contributors

The below list of organizations contributed comments to the Public Comment Proceeding and are listed in reverse chronological order of posting date (i.e., starting with the most recent posting):

Name	Submitted by
Texas First Bank	Scott Jasper, Systems Analyst
Canadian Life and Health Insurance Association	Anny Duval, Senior Counsel
E4 Brokerage, LLC	Danielle Zimbrick, Sales and Marketing Support
FI Navigator	Jon Kuck, EVP, Chief Revenue Officer
Purple Revenue, LLC	James Maxfield, Founder & Chief Salesman
The American Council of Life Insurers	David Leifer, VP & Associate General Counsel

Name	Submitted by
First Citizens Bank	Jeff Jancula, Chief Information Security Officer
Bridge Community Bank	Adam Sandberg, IT Officer/Customer Service
Montecito Bank & Trust	Paul Abramson, Chief Technology Officer
Independent Insurance Agents and Brokers of America	Kevin Brandt, Executive Director
Westfield Insurance	Mike Rossander, Privacy Officer
First Federal Savings and Loan Association of Delta	Jeremy Dotson, AVP, Information Security Manager

III. Summary of Comments

General Disclaimer: This section intends to broadly summarize the comments submitted to this Public Comment Proceeding but does not address every specific position stated by each contributor. For further details and context of the comments, please refer directly to the contributions at the link referenced above (Posting & View Comments Submitted).

Supportive Comments

All contributors were supportive of the Proposed Amendments and some provided comments that were supportive of specific amendments, such as those summarized below:

1. The addition of “supervised parent/holding companies” should fix confusion that we felt during the registration and verification process.
2. The clarifying language and the Board approval category are important to the insurance industry.
3. Agreement that non-bank entities should not be able to use .BANK.
4. Agreement as long as non-bank/non-insurance firms are excluded and extensive reviews are continued (i.e., verification).
5. Appreciation for the security that a .BANK domain provides, and the use of the domain as a primary-consumer facing website by banks, and not service providers.

Potential Concerns

1. Initially one contributor was concerned about the use restrictions noted in the Implementation Guidelines to the .BANK Registrant Eligibility Policy, but after clarification from fTLD he understood this was not applicable to eligible banks and was satisfied.
2. Another contributor was concerned about the addition of the word “retail” as excluding commercial and investment banks. fTLD clarified commercial banks are eligible (i.e., not excluded) and explained that investment banks are not eligible for .BANK unless they are regulated by the relevant Government Regulatory Authority (i.e., in a similar manner to retail banks).

3. The most recent contributor was concerned about the use restrictions similar to the above-noted item in 1, but did not understand the restrictions are not applicable to banks (similar to the contributor discussed in item 1). fTLD sent a direct response to this contributor to clarify the Implementation Guidelines are not applicable to eligible banks.

Other Comments

1. One contributor noted some universal acceptance matters in relation to the use of .INSURANCE and the lack of recognition of this new gTLD among large insurance carriers.
2. A couple of contributors commented on the security of .BANK/.INSURANCE, and one contributor focused on how .INSURANCE is a means to combat phishing, spoofing, and other threats.
3. One contributor noted that distinction that while .BANK is descriptive of the type of organizations that are eligible that .INSURANCE could be interpreted to have a broader marketing use given it is not “insurer” and could be expanded if it made sense to broaden the community of eligible registrants.

IV. Analysis of Comments

General Disclaimer: This section provides an overall categorization of the contributors’ comments during the Public Comment Proceeding.

There was a total of 12 organizations who contributed to the Public Comment Proceeding, and their comments were all supportive with a few expressing specific items (as described in further detail in Section III. Summary of Comments):

	Supportive	Supportive with Edits	Concerns	Other	
Totals*	11	1	3	3	

* The Totals exceed the number of contributors (12) as some comments included supporting statements along with additional commentary. The other comments were not specific to the Proposed Amendments. The Concerns were generally regarding the implementation (i.e., effect) of the Policies, as described in Section III) and after fTLD clarified the implementation and rationale these contributors seemed satisfied with the response. The contributor that was “Supportive with Edits” was mistaken about the implementation of the Policies, and fTLD clarified this to them; as a result, a revision or changes are not needed.

V. Conclusion & Next Steps

fTLD made multiple, broad announcements about the Public Comment Proceeding: via its websites and social media (i.e., Twitter and LinkedIn); and via email to its Board, Council, Registrants, Registrars and other stakeholders. Given fTLD’s Council, Board and Operating

Manager, who are all members of the global bank and insurance communities, voted to approve the Proposed Amendments and the overwhelming support expressed in the Public Comment Proceeding, there is no need for fTLD to make further adjustments to them.

In accordance with its Policy Development Process Policy, as these Proposed Amendments impact fTLD's Specification 12 (Community Registration Policies) of its Registry Agreements with ICANN, fTLD will follow the ICANN Procedure for Community gTLD Change Requests (available at: <https://www.icann.org/resources/pages/community-gtld-change-requests-procedure-2018-06-01-en>) as the next step of the policy implementation process.