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To: **Dr. Steve Crocker, Chairman**
Mr. Fadi Chehadé, President & CEO
Ms. Heather Dryden, GAC Chair

ICANN (the Internet Corporation for Assigned Names and Numbers)
Suite 330, 4676 Admiralty Way
Marina del Rey, CA 90292

Dear Dr. Crocker, Mr. Chehadé and Ms. Dryden

Referring to ICANN's new gTLD program and the applications submitted for the term ".ECO" through "Planet Dot Eco, LLC", "Little Birch, LLC", "Top Level Domain Holdings Limited" and "Big Room Inc.", the Economic Cooperation Organization (ECO) Secretariat would like to express its serious concerns toward ".ECO" new gTLD applications based on the following reason:

The applied for new gTLD exactly matches a name of an Intergovernmental Organization "ECO".

ECO is a known abbreviation for Economic Cooperation Organization.

Economic Cooperation Organization (ECO) is an intergovernmental regional organization established in 1985 as a trilateral organization of Iran, Pakistan and Turkey to promote multi dimensional regional cooperation with a view to creating conditions for sustained socioeconomic growth in the Member States. Its aims and objectives as its modes of operation were identical to those of its forerunner, the Regional Cooperation for Development (RCD) which remained in existence from 1964 to 1979. Subsequently, the organization was restructured and revived under the present name ECO.

The Treaty of Izmir signed in 1977 as the legal framework for the RCD and later adopted as the basic Charter of ECO was modified to provide a proper legal basis to ECO's transition from RCD at the Ministerial Meeting held in Islamabad in June 1990. Following the amendment in the Treaty of Izmir ECO was fully launched in early 1991.

The break-up of the former Soviet Union led to the independence of Republics of Central Asia and Caucasus. In their bid to open up to the outside world and as a manifestation of their urge to revive their historic affinities with the peoples of Iran, Pakistan and Turkey, six of these Republics; namely Azerbaijan, Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and

Uzbekistan along with Afghanistan sought the membership of ECO and were admitted into the organization. The participation of these new Members in the activities of the Organization commenced after their formal accession to the Treaty of Izmir at an Extraordinary Meeting of ECO Council of Ministers held in Islamabad on 28th May, 1992.

The Treaty of Izmir as the base Charter of ECO and its amendment are available on UN database of treaties with registration number I-28480 and UNTS volume 1655.

- Information about the treaty available here:

<http://treaties.un.org/Pages/showDetails.aspx?objid=08000002800d45f9>

and

<http://treaties.un.org/doc/Publication/UNTS/Volume%201655/v1655.pdf>

(on page: 201 to 220)

ECO is also granted Observer Status in the UN General Assembly on 13 Oct. 1993 (link: <http://lib-unique.un.org/lib/unique.nsf/Link/R02020>)

Moreover the ECO is considered an **Intergovernmental Organization** and it meets the eligibility criteria for **.int top level domain** as it has been established through a treaty registered by United Nations and recognized to have independent international legal personality.

ECO has permanent headquarter (ECO Secretariat) in Tehran, Iran. Further information about GCC can be found at the website www.ecosecretariat.org/

Therefore and in line with new gTLD program Applicant Guidebook ((item 3.2.2 Standing to Object) provisions **concerning protection of IGOs**, the name "ECO" **should not be allowed to be registered as a gTLD** unless sufficient approvals are obtained from the IGO.

Considering the above reason, the ECO Secretariat hereby **expresses its disapproval and non-endorsement** to all the applications submitted for ".ECO" gTLD and requests the ICANN and the new gTLD application evaluators to not approve these applications.

Respectfully submitted,

Abolghasem Tahmasebi
Deputy Secretary General

