GAC Advice Response Form for Applicants

The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section IV, Annex I, and Annex II of the GAC Beijing Communiqué for the full list of advice on individual strings, categories of strings, and strings that may warrant further GAC consideration.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for their consideration. Complete this form and submit it as an attachment to the ICANN Customer Service Center via your CSC Portal with the Subject, “[Application ID] Response to GAC Advice” (for example “1-111-11111 Response to GAC Advice”). All GAC Advice Responses must be received no later than 23:59:59 UTC on 10-May-2013.

Respondent:

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>GCCIX WLL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application ID</td>
<td>1-1936-21010</td>
</tr>
<tr>
<td>Applied for TLD (string)</td>
<td>.GCC</td>
</tr>
</tbody>
</table>

Response:

As a preliminary matter, the GAC Advice is untimely and is therefore not legitimate. The Applicant Guidebook forms part of the legally binding agreement between ICANN and New gTLD applicants. The Guide Book clearly states in sections 1.1.2.7 and 3.1 that for the Board to be able to consider GAC Advice, it must be submitted “by the close of the Objection Filing period”. That period concluded on 13th March 2013, yet GAC Advice was not communicated until 11th April 2013. We find it extraordinary that the ICANN Board and the New gTLD process would entertain such an untimely submission from any party.

Nevertheless, we are happy to explain how and why our application is legitimate and should be approved. Because we reject the GAC Advice as untimely, this response is submitted out of courtesy and not obligation; in responding, we reserve all rights in this matter.

Because the GAC Advice lacks any substance whatsoever with respect to our application, we have been in communication with Cherine Chalaby who advised “It is the ICANN Board New gTLD Program Committee’s understanding that the GAC [...] based on the rationale contained in the Early Warning has reached a consensus to object”. Our response will be based on points 1 and 2 raised in the Early Warning that can be found here:


We note from the Early Warning that the CCASG was aware of our application as early as November 2012, and has filed an LRO based on their purported IGO acronym. The DRP allows for multiple LROs on multiple grounds, and the CCASG chose not to submit an LRO on the community objection ground although they obviously feel qualified to do so and could have done so. As there is a clearly defined process in place by which the
CCASG could have objected on these grounds, it surely cannot be appropriate to consider or uphold a complaint on the same grounds via the GAC and Board path. Obviously the ICANN Board has previously determined that WIPO is better qualified to assess such cases involving Legal Rights Objections. If the GAC and Board instead choose to consider this Objection, they are at risk of undermining themselves as well as the process they jointly laid down. At minimum, we should be given full opportunity to see the arguments presented against us, and to provide counterarguments; this of course is fundamental to all of the Objection processes created already by ICANN.

The CCASG, as an IGO with independent legal personality must be considered competent to defend its own interests. As a super-national entity, the CCASG should be considered as a higher power than any of its individual parts, and its own conscious actions in defending the rights it has should overrule GAC level action at the merely national level. While its member states are at liberty to lodge GAC level advice to the ICANN Board, this should only be considered at most as support to the actual actions undertaken by the IGO secretariat itself.

Therefore, as the CCASG has not raised a Community Objection, the Board and GAC should not consider that basis at all. As they have raised a Legal Rights Objection, at minimum a full and fair hearing of the matter should be had, ideally through the WIPO neutral panel as set forth in the Guidebook. If the GAC and Board chooses to supplement or surpass the findings of WIPO, they do so at great peril to their credibility and to the credibility of the entire new gTLD program.

**Point 1 – IGO Name**

The authors state “GCC is a known abbreviation for Gulf Cooperation Council. The GCC is a political and economic union…”. This is manifestly untrue. The treaty cited establishes an entity given a completely different name, the Cooperation Council for the Arab States of the Gulf (hereinafter referred to as CCASG). The establishing treaty makes no reference to “Gulf Cooperation Council” or “GCC”:


**Article One. ESTABLISHMENT OF COUNCIL**

A council shall be established hereby to be named the Cooperation Council for the Arab States of the Gulf, hereinafter referred to as Cooperation Council.

The authors state “…the GCC is […] an Intergovernmental Organization…”. This is manifestly untrue. There is no valid citation to any authority or evidence to support this claim. There is no evidence of the legal existence of any purported legal entity with the name “GCC” and there is no evidence of the .GCC string having any internationally legally recognized link to the CCASG. Insofar as “GCC” does not exist in law, there is no basis for that acronym to benefit from protections afforded to legally recognized IGO names such as the CCASG.

The authors of the Early Warning state “[the GCC] meets the eligibility criteria for .int top level domain”. This is manifestly untrue. While the CCASG might meet these criteria, the IANA policy for .INT name registration states this requirement (emphasis in original):
GAC Advice Response Form for Applicants

“The treaty submitted must establish the organization applying for the .int domain name. The organization must be established by the treaty itself, not by a council decision or similar.”

As the purported entity “GCC” is itself not established by treaty, and the CCASG treaty makes no reference to “GCC” or “Gulf Cooperation Council”, the string “GCC” clearly does not meet the eligibility criteria for the .int top level domain. This perhaps explains why the CCASG has never applied for nor been awarded such domain name from IANA.

The authors state “...the GCC has received a standing invitation to participate as an observer in the sessions and the work of the UN General Assembly”. This is manifestly untrue. There is no reference to a “GCC” on the published list of United Nations Permanent Observers that is attached as Annex 1 hereto. Instead, the CCASG is listed under its only legal name, Cooperation Council for the Arab States of the Gulf.

The authors state “…in line with new gTLD program Applicant Guidebook provisions concerning protection of IGOs, the name ‘GCC’ should not be allowed to be registered as a gTLD…”. As detailed above, there is no legally recognized IGO entity, including the CCASG, with any proven rights to the “GCC” string. Consequently, the string “GCC” cannot receive protections afforded to legitimate IGOs.

GCCIX WLL, however, can demonstrate rights to, and bona fide use of, the “GCC” string. Our company, GCCIX WLL, containing the string, is registered (CR #78805) with the Bahraini Ministry of Industry and Commerce since August 2011. GCCIX WLL own trademark registration number VR201300642 with the Danish Patent and Trademark office in classes 9,42,45.

Based on Toronto communiqué, the GAC issued further advice on the protection of names and acronyms of IGOs to the ICANN Board.

https://gacweb.icann.org/display/GACADV/2012-10-17-IGO

On 22th March 2013 the GAC submitted agreed criteria, and a list of IGOs to the Board to support this advice. We do not understand on what basis the GAC included “Cooperation Council for the Arab States of the Gulf (GCC)” in that list, but it is immaterial in light of the accompanying criteria:

Protection for the names and acronyms of the listed organizations shall be provided at the second level in all rounds of new gTLDs and at the top level in all except the first new gTLD round

It is obvious that GAC and the ICANN Board put a great deal of thought and effort into laying down the rules for the protection of legitimate IGO names and acronyms. We have demonstrated above that the “.GCC” string is not included in the protections offered under these rules, and that it is specifically excluded by the GAC from protection as an IGO name in this round of applications.

In spite of the above, our application is currently subject to a WIPO Legal Rights Objection on the grounds that it infringes on the rights of the CCASG. We note that the CCASG was party to the GAC Early Warning that is the sole basis of the GAC Advice submitted to the ICANN Board, and conclude that they shared their concerns via this path as well as via the LRO because of a lack of clarity around the formal process.
We prove in our Response to that Objection that ‘GCC’ is a geographically descriptive term referring to the entire Gulf Coast region much more than to the CCASG. Therefore we have a legitimate right to operate that TLD in accord with the terms of the Applicant Guidebook, and internet users in that region and abroad have the legitimate right to use such domain names to identify themselves. Expert analysis on this point is provided as Annex 2 hereto.

We do not believe that it is within the purview of the Board to elevate arbitrary strings to the status of IGO names, where no such rights previously existed in law or practice, and in doing so afford them the same protections as legally recognized IGOs. To do so would set a dangerous precedent, exposing ICANN to legal challenge, and undermine the genuine claims of legitimate IGOs.

As it is not the core competence of the ICANN Board to adjudicate cases of rights infringements, we suggest that it would be prudent for the Board to defer to the WIPO panel appointed to assess the ongoing LRO. The New gTLD process was well designed to allow for exactly the sort of challenge that our application has received, and the allegedly infringed party has found that process and invoked it. The GAC and the Board should respect and adhere to the process that they jointly defined.

In the event the ICANN Board will consider the legal rights issue at hand, GCCIX will provide its full Response to that objection, and all accompanying evidence, to the ICANN Board when it is completed next week.

Point 2 – Community support

The authors of the Early Warning state “the applicant is targeting the GCC community which basically covers the 6 member states of the GCC”. As explained in great detail above, “GCC” is not a legal entity capable of having “member states”.

The Applicant Guide Book discusses community gTLDs in section 1.2.3.1, where they are defined as being “…operated for the benefit of a clearly delineated community” and our application does not meet this criterion. We explained in our application that we perceive the “GCC” string as a “broad regional identifier”, and we used explicit wording throughout to make it clear who we believe our target audience to be:

“users in the Gulf and Middle East region” [In addition to CCASG members, the term “Middle East” includes Cyrus, Egypt, Iran, Iraq, Israel, Jordan, Lebanon, Palestine, Syria, Turkey, and Yemen]

“.gcc will be marketed globally”

“Internet users with an interest in or connection with the Gulf and Middle East”
“the term GCC has become commonly used to refer generally to the countries and people of the Gulf and Middle East region”

The Guide Book states in 1.2.3.2 that:

All applicants should understand that a formal objection may be filed against any application on community grounds, even if the applicant has not designated itself as community based or declared the gTLD to be aimed at a particular community.

Our application attracted the attention of the Independent Objector who scrutinized it on various grounds, including the potential for a “Community Objection”. In his final assessment, the IO did not see fit to object on community grounds. The IO clarified in his report:

“...it is the public policy of the IO not to make an objection when a single established institution representing and associated with the community having an interest in an objection can lodge such an objection directly”

and

“...the IO is of the opinion that the Gulf Cooperation Council is an established institution representing and associated with a significant part of the targeted community. The Gulf Cooperation Council is already fully aware of the controversial issues and is better placed than the IO to file an objection, if it deems it appropriate”

and

“...the [LRO based on infringement of IGO name or acronym] procedure is a significant opportunity given to the Gulf Cooperation Council to file an objection, if deemed appropriate, against the application”

In summary, the IO chose not to lodge a community objection because he found the CCASG qualified to do so, but then steered the CCASG away from an LRO on community objection grounds. The CCASG then decided against filing a Community Objection, and instead only filed a Legal Rights Objection. We conclude from this, and from the LRO submitted, that neither the IO nor the CCASG felt that a community objection could possibly be warranted. Certainly the GAC and the ICANN Board would not wish to second guess these determinations by the two best placed potential objectors.

Therefore, we request the Board to disavow the bare, unexplained GAC Advice with respect to our application, and instead to defer to the WIPO process that has been initiated by the CCASG. At minimum, the Board should seek full and detailed advice
from the GAC and then allow GCCIX the full opportunity to provide our informed response.
The use of GCC as an acronym in the context of the Gulf

Cross-border Information Ltd for GCCIX

16 October 2012

Overview

This research report demonstrates that the acronym GCC in the Gulf region has become separated from the Gulf Cooperation Council organisation and has become synonymous with the region made up of the members of this organisation. It shows that this general use of the GCC acronym is widespread and long established, and that the Council has not attempted to block or thwart organisations which have adopted its initials for their own purposes.

The report shows that GCCIX is far from being alone in having taken the GCC initials as part of the name that the company is registered under. We have also found numerous examples in which companies – regardless of where they are registered – have used the GCC initials as part of the branding for products and services aimed at a Gulf market. Not surprisingly, the use of GCC as a brand is most common in financial services and conferences where a regional identity is a strong selling point. In these cases it is obvious that the businesses in question are attempting to associate themselves and their products with the GCC region rather than with the Council as an institution or even as form of trans-national bureaucratic organisation. It is also clear that these businesses are not attempting to pass themselves off as being somehow formally linked to the organisation of the Council or its secretariat. There is no record of the GCC having ever objected to the use of the initials in this way.

The use of the GCC acronym in the media and by academics, consultants, analysts and think tanks as a regional geographical description is so widespread as to be impossible to quantify. There is a frequently occurring trend to use the GCC acronym on its own at first usage in an article when it is meant to refer to the region, and to use the full name of the Gulf Cooperation Council to introduce the organisation itself. This pattern clearly demonstrates that amongst analysts, journalists, editors and readers there is an established understanding that the initials GCC, on their own, no longer refer only to the Gulf Cooperation Council, as an organisation, but also refer to the region made up of its members. In fact, this trend is so common that it might be possible to argue that unless the Council is specifically referred to by its full name, a reference to GCC in a Gulf context is unlikely to be understood as indicating the institution rather than the region.

1. Use of GCC in company names

We have identified a number of companies based both in the Gulf region and outside it, which use the GCC acronym in their names in a way which is clearly meant to imply a focus on the member countries of the Gulf Cooperation Council, but no specific link, relationship or cooperation with the Council itself. These companies appear to have been operating for many years without meeting any opposition or challenge to their use of the GCC initials in this way from the Council.

1.1 Fermacell GCC
Fermacell GmbH’s Gulf branch is registered as Fermacell GCC with the Dubai Chamber of Commerce and uses the web address www.fermacell-gcc.com. The company installs partitions, linings, west areas, flooring, ceilings and fire protection panelling.

1.2 ICDL GCC Foundation
The ICDL GCC Foundation is owned and run by The European Computer Driving Licence Foundation Ltd, a not-for-profit organisation based in Dublin, Ireland. The foundation provides training in GCC countries and Iraq for people seeking to achieve the International Computer Driving Licence. It is not made explicit that GCC stands for Gulf Cooperation Council but it appears very likely that it is given the countries it serves. The foundation is partnered with the ministries of education of Bahrain, Oman, Qatar, Saudi Arabia (education authorities) and the UAE as well as other educational organisations but not the GCC.

The company website homepage states; With hundreds of centres covering the GCC region and Iraq, you will surely find one near you

1.3 Mars GCC FZE
The confectioner Mars Inc’s Dubai based subsidiary in the Gulf is named Mars GCC and appears under that name in the Dubai Chamber of Commerce directory. The company was previously known as Master Foods Middle East. The company was incorporated in 1993. It is not clear when it changed its name or whether this was the result of a takeover, although media reports begin to refer to Mars GCC rather than Master Foods in late 2007/early 2008. There are no references to Mars GCC in the Google News archives, the Mars website or Factiva before 2008. Blurb refers to “Mars in the GCC”, another example of GCC used as a geographical reference term, as well as operating “across all the GCC countries”.

1.4 VFS (GCC) (L.L.C)
A subsidiary of VFS Global, itself a wholly-owned subsidiary of Kuoni Group, VFS (GCC) (L.L.C) uses the term GCC as a regional reference for its regional subsidiary in the UAE. The company is an outsourcing and technology services specialist working with embassies and governments around the world.

1.5 GCC Exchange
GCC Exchange was established by Rajesh Himmatlal and Mukesh Himatlal and registered with Companies House in the UK. The company set up its first outlet worldwide in Dubai in December 2005. It operates in the field of retail money transfer. Again it is not made explicit that GCC is an abbreviation of Gulf Cooperation Council but there is no reference to it being an acronym for anything else. It is registered as GCC Exchange and this appears to be its fully expanded name.

The company has a product called GCC Remit which is aimed expatriates. The product does not appear to be limited to GCC region expatriates and uses GCC as a brand name.

1.6 AGAS-Basil Technology Fund
The private equity fund’s investment arm holding investments in GCC member states is called AGAS GCC Holding. The company is registered with the Bahrain Chamber of Commerce.

1.7 Green Cover
Oman registered MENA artificial turf specialist is listed as Green Cover GCC. The company has distributors in Saudi Arabia, UAE, Qatar, Bahrain, Kuwait, Yemen, Iraq, Syria, Egypt, Libya and Algeria. As with many other companies it is not explicit what the GCC stands for, it is possible that it stands for Green Cover Company.
2. Use of GCC as a brand

The GCC acronym is widely used by a variety of corporations to promote their business activities in the Gulf region. In most cases this does not imply any connection to the Gulf Cooperation Council itself and rather a simple regional marketing focus on the countries which in the past used to be referred to as ‘the Gulf monarchies’.

The Council appears to have been content over many years to allow its initials to be used by these organisations as a label to promote various products and services, without taking any steps to object to this usage or to apply legal or political pressure to limit this usage. Companies which have adopted GCC as a brand include both those with their origins outside the region and within it.

Finance

There are sufficient examples of the use of the term GCC in the names of financial products to suggest the term is used ubiquitously as a geographical descriptor in the sector. Some examples follow.

2.1 Saudi Fransi Capital

*Saudi Fransi Capital* managed *Al-Qasr GCC Real Estate and Construction Equity Trading Fund* is a fund investing in listed Sharia compliant real estate equities in GCC states. The fund began operating in April 2007.

2.2 Global Investment House

Kuwaiti investment company listed in Kuwait, Dubai, Bahrain and on the London Stock Exchange also operates a number of closed-ended funds investing real estate in GCC countries. These are called *Global GCC Real Estate Fund* (launched 2005) and *Global GCC Real Estate Fund II* (launched in 2008), domiciled in Bahrain.

*Global Investment House* also manages a fund investing in large cap stocks listed “on the GCC stock exchanges”. This is called the *Global GCC Large Cap Fund*. A third Gulf focussed fund investing in Sharia compliant stocks is called the *Global GCC Islamic Fund*.

2.3 Masraf Al Rayan

*Masraf Al Rayan* bank runs a Sharia compliant investment fund for Qatari investors called the *Al Rayan GCC Fund*. The fund will invest in “a select number of companies across the GCC”.

According to the bank, “The focus of the Fund is GCC equities which offer medium to longer value. However, the Fund can also invest in Shari’a-compliant GCC fixed income and money market instruments.”

2.4 Albilad Investment Company

*Albilad Investment Company* manages a fund investing in Sharia compliant real estate companies in the GCC. The fund is called the *GCC Real-Estate Equity Fund (Aqaar)* and was launched in July 2010. According to the company website “the fund adopted a cautious investment strategy by diversifying risks through out the GCC’s markets”.

2.5 Barwa Bank

Qatar’s *Barwa Bank* established in July 2012 an open-ended collective investment scheme for Qatari nationals called *The First Investor GCC Equity Opportunities Fund*. The fund invests in equities and equity-related securities of companies listed on stock exchanges “within the Gulf cooperation Council (the “GCC”) countries”. The fund is managed by *The First Investor*.

2.6 Gulf Investment Corporation

The *Gulf Investment Corporation* categorises its “GCC region” funds into a group of four funds known as the *GCC Funds*.
Conferences
Conference organisers have been assiduous in using the GCC initials as a label to promote their regional focus on the countries belonging to the Council. But in many cases this does not imply any link to, or support from the Council itself. In most cases, while the activities of the Council as an organisation may be discussed – it is in fact the activities of national governments which are scrutinised at these events.

2.7 Gulf Research Center
The Gulf Research Center will hold the GCC-Switzerland Forum in September 2013. The event “aims to assess the status quo of relations between Switzerland and the six GCC countries”. The Center was established in 2000 by Saudi businessman Dr Abdulaziz Sager. The organisation has offices in Geneva, Cambridge and Jeddah. It operates on an independent and not-for-profit basis.

2.8 Euromoney

2.9 Middle East Association and City of London Corporation
The Middle East Association and City of London Corporation held the fourth annual “City and GCC Countries Conference” in London, the UK. The MEA is an independent UK-based trade body with offices in central London. It has no formal links to the Council and organises this and many other events for the benefit of its members and for paying subscribers without reference to the Council.

2.10 8th International Scientific Conference for Medical Students of the GCC countries
The 8th International Scientific Conference for Medical Students of the GCC countries took place at Sultan Qaboos University in Muscat, Oman, in January 2012. Oman’s Minister of Health Dr Ahmed Bin Mohammed Al-Saeedi attended, suggesting no objection from the government to the use of the term GCC.

2.11 Datamatix Group
Dubai based information technology and conference organiser Datamatix Group is a serial user of the term GCC when referring to member states both in its conference and award branding. Datamatix is associated with the GCC Global Competitiveness Development Institute, which “aims at becoming an internationally recognized quality management standard developer”. Ownership is not clear and we therefore cannot conclude that the organisation is definitely unaffiliated with the GCC.

Examples
- The company is leading the GCC 2015 eBusiness and Information Society project, which utilises the internet domain www.gccinfosociety.com. The project aims to congregate 1m GCC organisation and community websites to create a strong online business and information society
- The company is organising the GCC eTourism Development Conference in November 2012 in Dubai
- It is also holding the 9th GCC Banking and Financial Markets Conference in November 2012 in Dubai
- 2nd GCC Municipalities and Towns Planning Global Competitiveness Conference, December 2012-10-12
- 4th GCC Government Organization Websites Global Competitiveness Conference, December 2012
- International Position’s Challenges for (GCC) Nationals Conference, December 2012
- 2nd GCC Export and Re-Export Conference, January 2013
- The company holds the GCC Websites Excellence Awards

Sport
In a number of cases, popular sporting events have taken the GCC label to indicate that participants are from GCC member states. But the Council itself does not have any direct affiliation with the promotion, sponsorship or organisation of the event.

We have attempted to be cautious about which events we include in this section of the report as the GCC General Secretariat of the National Olympic Committees may extend some kind of approval to certain sporting events which could be interpreted as a licence to use the initials as a label.

2.12 GCC Bowling Championships
There are a number of regional bowling competitions branded as GCC Bowling Championships. The Fourth GCC Bowling Championships for the hearing impaired took place in Bahrain earlier this year and was sponsored by the Bahrain Olympic Committee, Ministry of Interior, Ithmaar Bank, Toyota, Bahrain Petroleum Company, Chevron, Al Baraka Banking Group, Bahrain Financing Company and Funland Bowling Centre. The Council was not involved.

Other
2.13 World Travel Awards
World Travel Awards give awards to travel industry players each year, including the GCC's Leading Travel Management Company award, in 2012 given to Abu Dhabi Travel Bureau. GCC is clearly being used here to refer to the geographical region in which travel companies are operating, rather than GCC as an organisation. WTA was established in 1993 by Graham E. Cooke and is based in London. The organisation’s main sponsors in 2011 were BBC World News, the Jamaica Tourist Board, Emaar Hotels & Resorts, Armani Hotel Dubai, Sandals Resorts, Tourism Authority of Thailand and WeClick Media. Its media partners are International Herald Tribune, CNBC Arabiya, National Geographic Traveller, eTurboNews, Breaking Travel News, Khaleej Times, Trav Talk, Trade Arabia, TTN, Travel Daily News, Focus on Travel News, Publituris, Passport Magazine, Travel & Leisure China and Xenios World. WTA has no known affiliation to the GCC.

2.14 CPI Financial
Dubai based financial news and information company CPI Financial holds annual Islamic Business & Finance Awards 2012, established in 2005. Many of the awards use the term GCC as a geographical descriptor, restricting candidates to institutions based in GCC member states.

Examples include:
- Best Islamic Wholesale Bank – GCC
- Best Islamic Investment Bank - GCC
- Best Islamic Retail Bank - GCC
- Best Takaful Operator - GCC
- Best Islamic Wholesale Bank - MENA non-GCC
- Best Islamic Retail Bank - MENA non-GCC
- Best Takaful Operator - MENA non-GCC

3 Media and Entertainment
Media organisations of all sizes and localities are regularly using the term GCC to refer to the member states rather than the Council itself. Incidents of this type of usage are so common that it is only possible to present a very small illustrative sample from the most popular media outlets. The corporate and brand examples listed above present more concrete and formal examples of how the acronym has ceased to be the exclusive preserve of the Council, and also provide examples of cases when the Council had a realistic opportunity to object. By contrast, the following media examples demonstrate how in the general public understanding – not just of the Gulf itself – but also globally –
GCC is no longer a term which exclusively refers to the Council which bears the initials. In fact it is in a minority of cases that initials are used to refer to the actual organisation. It is notable that unlike the EU and the IMF whose initials are synonymous with the organisation and which many news organisations use without spelling out the name in full, the Gulf Cooperation Council is almost always referred to by its full name at the start of any article which deals with it specifically. Conversely, when GCC is used on its own, the implication is that the region or collection of member states is being referred to and specifically not the actual organisation.

News outlets
The GCC acronym has been adopted widely by media – especially media based in the Gulf region itself, but also global media to some extent, as a synonym for the Gulf States who are members of the Council. It is worth focusing on the detail of journalistic style to understand the full significance of this point. There are some major global news organisations such as Reuters and the BBC which may use the GCC acronym on its own in a headline, but invariably spell out the Council’s full name the first time that the acronym is used in the full text of the article. These organisations often also follow this first use of the acronym with a list of the member countries. They, however, are the exception and are catering for a global audience which is not necessarily familiar with the Gulf region.

The vast majority of news organisations which are focused on reporting of the Gulf and Gulf affairs not only use GCC in the headlines of news articles to refer to the region rather than to the Council itself, but also frequently use the GCC acronym in the main text of articles without any reference to the Council at all. By contrast, when these organisations wish to refer specifically to the Council it is almost always refer to by its full name on first mention and sometimes even refer to it by its full formal name of Co-operation Council for the Arab States of the Gulf. This clearly demonstrates that in public and popular understanding, the GCC initials now carry their own separate meaning related to the wider region and not to the Council itself.

3.1 Zawya
Like many media outlets, Zawya frequently uses GCC as term referring to a region, rather than the Council.

10 October 2012 “The GCC market is unique in structure…”

3.3 Al Bawaba News
Large Oman based internet publisher

“The GCC hospitality sector is poised for healthy growth owing to favourable economic conditions, infrastructure development, increased bids to host high-profile global events and government support to the private sector.”

“In remarks at the end of a meeting of Gulf Cooperation Council and EU foreign ministers in the Spanish city of Granada…”

3.4 Gulf News
Dubai based English language Gulf News with an average daily circulation of more than 100,000 on Thursdays and Sundays in 2011.

“The GCC market is unique in structure…”
“Six members of the current Australian squad, including Brosque, are playing in the GCC region”

“Challenge of entrepreneurship in GCC”
“This shows that small firms in GCC are relatively inefficient”

“The seventh consultative summit of the Gulf Cooperation Council is set to begin.”

3.5 Gulf Times
“Qatar bourse on track for listing by GCC firms – The Qatar Exchange is on track to witness the advent of listed companies from other Gulf countries and allow securities lending and borrowing (SLAB) as part of attracting more foreign investments. “We are in discussion with a number of GCC-listed companies who are actively working toward listing here in Qatar,” Qatar Exchange’s newly appointed CEO Rushid bin Ali Al-Mansoori told the Meed Qatar Banking Summit.”

“International Monetary Fund (IMF) Managing Director Christine Lagarde (centre) with Bahrain’s finance minister Ahmed bin Mohammed Al-Khalifa (left) and Saudi Arabia’s finance minister Ibrahim al-Assaf before the Gulf Cooperation Council (GCC) finance ministers meeting in Riyadh recently.”

3.6 Oman Daily Observer
Oman based daily newspaper

“There is no doubt that millions of expatriates flock to GCC countries…”
- http://main.omanobserver.om/node/113863

“Dr Bakhit al Mahri, Member of the Majlis Addawla and Educational Director at the Co-operation Council for the Arab States of the Gulf Secretariat General…”
- http://main.omanobserver.om/node/101211

3.7 Middle East Economic Digest
Specialist regional publication

“Most of the major airports in the GCC are reporting increases of between 10-20 per cent in year-to-date passenger numbers.”

“Countries still need to ratify Gulf Co-operation Council proposals”
“The parliament’s foreign affairs committee approved the Gulf Co-operation Council’s proposals for a single currency.”
3.8 Dubai Chronicle
Privately owned online publication founded in 2007.

“The development is particularly targeted at GCC, Chinese and Russian investors.”

“His Excellency Eng. Sultan Bin Saeed Al Mansoori, UAE Minister of Economy, today inaugurated the 21st meeting of the Gulf Co-operation Council (GCC) Committee of Ministers of Planning and Development…”

3.9 Emirates 24/7
UAE based online publication

“Emami International, the Dubai-based subsidiary of the $450 million (Dh1.65 billion) Indian business entity, Emami Group, said the GCC market for men’s face care was growing at 37 per cent”

“Mohammed Al Jasser, Governor of the Saudi Arabian Monetary Agency (Sama), is the most likely candidate to chair the board of the future central bank of the Gulf Co-operation Council, Asharq Al Awsat reported yesterday, citing officials.”

3.10 Gulf Daily News
Bahrain based daily newspaper

“GCC countries represent a market worth more than $1 trillion to foreign investors”.

"We have confronted them with determination through unified positions reflected in the pioneering role of the Gulf Co-operation Council and we seek with the help of God to strengthen the unity between its member states." His Majesty King Hamad Al-Khalifa

3.11 Arab Finance
ArabFinance.com is an online provider of financial information as well as financial services.

“Despite concerns over hotel room oversupply as well as political risks in some destinations in the GCC, outlook for the six-nation bloc’s hotel sector remains highly positive.”

3.12 Travel and Tourism News Middle East
Part of the Al Hilal Publishing and Marketing Group

“GCC gets first green tour company”
“…our fresh concept of travel throughout the GCC region…”

Books
Well known publishers from Europe and the United States have frequently published books which are titled using the term GCC to refer specifically to member states or characteristics, institutions or individuals residing in member states.

Examples include:

3.16 Schriften zur Gesundheitsökonomie
Schriften zur Gesundheitsökonomie have published a book called, Managed Equipment Services as a Conceptual Business Opportunity Model for the GCC with focus on UAE: An Institutional an Economic Analysis. The book was written by Michael J. Kloep and was published November 2011.

3.17 Wiley Finance

3.18 Routledge Advances in Middle East and Islamic Studies
Routledge division Routledge Advances in Middle East and Islamic Studies is planning on publishing a book called Higher Education in the Gulf: Revolution in GCC Institutions by Fatima Badry and John Willoughby in January 2014.

3.19 Springer Science and Business Media New York

3.20 VDM Verlag Dr. Müller
The book Arab GCC Banking: Measurement of Competition by Saeed Al-Muharrami was published in March 2010 by VDM Verlag Dr. Müller.

3.21 ICON Group International Inc

4 Use of GCC as a geographical term

A large number of the most authoritative organisations which analyse and report on the Gulf region use GCC as a regional geographical term rather than a term indicating the actual institution. The fact that this understanding has been adopted by organisations such as the Royal Institute for International Affairs (Chatham House), the UK Government, the IMF, World Bank, Gulf Research Centre and other respected bodies shows the extent to which the independent usage of GCC as a term has been established and accepted in a way that can only be described as authoritative.

4.1 Chatham House
Chatham House is currently running a project in its Middle East and North Africa unit entitled “Future Trends in the GCC”. GCC here refers to the geographical area defined as the member states of the Gulf Cooperation Council but has no relation to the GCC as an organisation. GCC has broadly been substituted for what might in previous decades have been called the Gulf monarchies.

An example of use of the term GCC in the project can be seen in the transcript from two Chatham House workshops which took place in May 2012 - Identities and Islamisms in the GCC and Political and Economic Scenarios for the GCC. The term is consistently used as a geographical label.

Examples from Identities and Islamisms in the GCC:
Changing dynamics in the wider Middle East region are bound to have an impact on the GCC states. The perceived success or failure of the Egyptian transition will affect views of both democracy and political Islam in the GCC, pp2.

Sectarian tensions are being fuelled by inter-state competition. They also reflect socio-economic cleavages, being more pronounced in Bahrain and Saudi Arabia than in the other GCC countries where socio-economic differences are less manifest, pp2.

GCC governments, pp4.


Examples from Political and Economic Scenarios for the GCC are clearer still:

- Longstanding efforts to diversify the GCC economies away from oil, pp2
- Yet the nature of citizenship in the GCC is also shaped by the political economy of the GCC countries, pp3
- However, this growth was almost exclusively driven by dramatic increases in state spending, which have been a continuous feature of GCC economic policy, pp4

Here the term is clearly used in a manner completely removed from the Gulf Cooperation Council. It refers to GCC economic policy, for example, in a way in which the author appears to have assumed self-evident that this refers to the economic policy of member states of the GCC, rather than the policy of the council.


4.2 Alpen Capital

Alpen Capital, a GCC and Asia focussed investment bank, produces research reports on economic trends in GCC states. These use the term GCC as an indicator of an economic entity unrelated to the Gulf Cooperation Council. See for example the company’s March 2012 report, GCC Construction Industry

This is emphasised by turns of phrase such as;

- growth is also not uniform across all regions within the GCC, pp6
- GCC region continues to enjoy premium on rental yields, pp6
- The GCC, which is home to more than 16 million expatriates from around the world with strong aspirations and preferences for their own homes, is likely to drive the housing demand across the region, pp7


Other private companies use the term GCC in a similar context in their research documents, see for example Markaz subsidiary Marmore (www.e-marmore.com), Ventures Middle East (www.indexexhibition.com/files/gcc_hospitality_sector__may_2011.pdf) or A. T. Kearney (http://www.atkearney.ae/index.php/News/gcc-banks-may-see-wave-of-mergers-and-acquisitions.html)

4.3 The World Bank

The World Bank refers to the GCC as a geographical region in its December 2010 report on “Investment Funds in MENA”.

Examples include;
At present, GCC investors are able to access real estate investments only with difficulty and considerable risk, pp7

A GCC-only analysis finds that GCC-domiciled investment funds that invest in the GCC account for just 1.7 percent of GCC total stock market capitalization, pp8

There is also wide variance within the GCC, pp9


4.4 The International Monetary Fund

The IMF has also produced reports using the term GCC as a geographical descriptor. Consider the April 2010 working paper, “The GCC Banking Sector: Topography and Analysis”. This is made more or less explicit in the opening statements, “In this paper, we analyze the evolution of the Gulf Cooperation Council (GCC) banking sectors in the six member countries”.

The term is used like this throughout the paper. Some examples include;

- Chapter headings such as, “Structure of the GCC Financial System” and “GCC Banking Sector Balance Sheets: Stylized Facts”
- capital inflows to the GCC region, pp4
- Section I describes the structure of the financial sector, including cross-border ownership within the GCC, pp4


4.5 Gulf Research Centre

The Gulf Research Centre Cambridge, a branch of the Dr Abdulaziz Sager’s Gulf Research Center (above), inaugurated the Gulf Research Meeting in July 2012. The keynote speech at the inauguration was given by Major General Dr Abdul Latef Bin Rashid Al-Zayani, Secretary General of the Gulf Cooperation Council. Two workshops at the first Meeting were titled using GCC as a regional descriptor; The Arab Spring: Impacts and Consequences on the GCC and Socio-economic Impacts of GCC Migration. It is clear from the texts of both workshops that GCC refers to Gulf states, rather than the Council.

4.6 Economist Intelligence Unit

In March 2009 the research company The Economist Intelligence Unit published a report called The GCC in 2020 Outlook for the Gulf and the Global Economy. The report was sponsored by the Qatar Investment Centre.

Examples of the use of the term GCC in the report:

- Over the past ten to 12 years, the Gulf Co-operation Council (GCC) region, which comprises Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates, has undergone rapid economic, demographic and social changes, pp2
- In the first report, we look at the role that the GCC will play in the global economy, pp2
- As US economic growth has slowed, GCC investors have begun to diversify their assets more widely, pp2


EIU reports utilising similar use of the term:

4.7 Institute of International Finance

Global association of financial institutions, the IIF regularly produces research reports for its members. One of these, GCC: Regional Briefing from 2008, frequently refers to the ‘GCC’ in reference to the member states or institutions residing in the member states.

Examples of use of the term GCC:
- GCC banks have remained well capitalized and profitable
- Risks to the GCC region have risen, but are likely to be contained
- GCC Outlook: Baseline and Low-Case Scenarios

www.iif.com/download.php?id=L/hOjB87aN4

4.8 UK Foreign and Commonwealth Office

UK government department - Note from the British Embassy in Abu Dhabi

“Food and water security is a serious issue in the Gulf. The Gulf States rely on desalination for much of their water supply and import a high proportion of their food. Benefits could be reaped from a regional approach. Food and water security is a major issue for the GCC countries.”


Conclusion

As the numerous examples cited in this report demonstrate, the GCC acronym is widely used by companies, financiers, conference organisers, journalists, analysts, academics and officials to refer to the region comprised of the six countries that are members of the Gulf Cooperation Council. When the initials are used in this way, they are not meant to refer to the Council as an institution or body itself. The term GCC is of course also used in a wide variety of contexts to refer to the Council or its associate bodies and policies. But very often the full name of the Council is included in order to avoid ambiguity. The existence of such a broad range of examples of the acronym GCC being used as a purely region term is the foundation of our conclusion that the initials no longer refer exclusively to the Council and its activities in a Gulf context.

In all the examples that we have cited, perhaps most relevantly in the commercial and corporate examples at the start of the report, there is no evidence that the Gulf Cooperation Council has ever attempted to claim an exclusive right to use its initials – nor that it has ever taken steps to prevent independent commercial organisations for adopting the initials as part of their corporate identity or brand marketing. There is also no suggestion that the businesses which have adopted the GCC identity in the ways described are in any sense attempting to pass themselves off as being affiliated to the Gulf Cooperation Council or its related bodies. Public understanding appears to be well used to the idea that the GCC label indicates a regional focus rather than any organisational attachment.

These findings based on an empirical study of the way that the GCC acronym is used across the public sphere are the basis for our conclusion that the term is no longer the exclusive preserve of the body that originated it.

About the author
The lead editor of this report is John Hamilton, a director at Cross-border Information (CBI) and a contributing editor of the respected Middle East-focused fortnightly Gulf States Newsletter (GSN).

CBI is a business intelligence and consultancy company that tracks people, politics and business across Africa and the Middle East. We undertake due diligence and corporate intelligence investigations and provide consultancy services through written reports, confidential briefings and interactive seminars. Our staff expertise is backed by an extensive network of local sources and the CBI Archive - a proprietary database providing corporate clients with over three decades of valuable intelligence on a subscription or search-and-buy basis.

GSN is CBI’s Gulf-focused political risk consultancy and business information portal. It has been producing fortnightly analysis of the Gulf region since 1974.

http://www.crossborderinformation.com/

http://www.gsn-online.com/

Cross-border Information, 16 October 2012
Permanent Observers

Intergovernmental organizations having received a standing invitation to participate as observers in the sessions and the work of the General Assembly and maintaining permanent offices at Headquarters

- **African Union**
  - Office of the Permanent Observer for the African Union to the United Nations
    3 Dag Hammarskjöld Plaza, 305 East 47th Street, 5th Floor, New York, NY 10017
    Telephone: (212) 319-5490

- **Asian-African Legal Consultative Organization**
    404 East 66th Street, Apt. 12C, New York, NY 10065
    Telephone: (212) 734-7608

- **Caribbean Community (CARICOM)**
  - Office of the Permanent Observer for the Caribbean Community (CARICOM)
    88 Burnett Avenue, Maplewood, NJ 07040
    Telephone: (973) 378-9333

- **Central American Integration System**
  - Office of the Permanent Observer for the Central American Integration System to the United Nations
    211 East 43rd Street, Suite 701, New York, NY 10017
    Telephone: (212) 682 1550, 874-3042

- **Commonwealth Secretariat**
  - Office of the Commonwealth Secretariat at the United Nations
    800 Second Avenue, 4th floor, New York, NY 10017
    Telephone: (212) 599-6190, 682-3658, 338-9410

- **Cooperation Council for the Arab States of the Gulf**
  - Office of the Permanent Observer for the Cooperation Council for the Arab States of the Gulf to the United Nations
    100 Park Avenue, Suite 1600
    New York, NY 10017
European Union

- Delegation of the European Union to the United Nations
  222 East 41st Street, 20th Floor, New York, NY 10017
  Telephone: (212) 371-3804

International Criminal Court

- Liaison Office of the International Criminal Court to the United Nations
  866 United Nations Plaza, Suite 476
  New York, NY 10017
  Telephone: (212) 486-1362/1347

International Criminal Police Organization (INTERPOL)

- Office of the Special Representative for the International Criminal Police Organization (INTERPOL) to the United Nations
  One United Nations Plaza, Room 2610, New York, NY 10017
  Telephone: (917) 367-3463

International Development Law Organization

- Office of the Permanent Observer for the International Development Law Organization to the United Nations
  Uganda House
  336 East 45th Street, 1st Floor
  New York, NY 10017
  Telephone: (212) 867-9707 (Office)
  (646) 229-0936 (Cellular)

International Institute for Democracy and Electoral Assistance

- Office of the Permanent Observer for the International Institute for Democracy and Electoral Assistance to the United Nations
  336 East 45th Street, 14th Floor, New York, NY 10017.
  Telephone (212)-286-1084

International Organization for Migration

- Office of the Permanent Observer for the International Organization for Migration to the United Nations
  122 East 42nd Street, Suite 1610, New York, NY 10168
  Telephone: (212) 681-7000, Ext. 200
- **International Organization of la Francophonie**
  
  Office of the Permanent Observer for the International Organization of la Francophonie to the United Nations  
  801 Second Avenue, Suite 605, New York, NY 10017  
  Telephone: (212) 867-6771

- **International Renewable Energy Agency**
  
  Office of the Permanent Observer for the International Renewable Energy Agency to the United Nations  
  Uganda House  
  336 East 45th Street, 11th Floor  
  New York, N.Y. 10017  
  Telephone: (212) 867-9707

- **International Seabed Authority**
  
  Office of the Permanent Observer for the International Seabed Authority to the United Nations  
  One United Nations Plaza, Room 1140, New York, NY 10017  
  Telephone: (212) 963-6470/6411

- **International Tribunal for the Law of the Sea**
  
  Office of the Permanent Observer for the International Tribunal for the Law of the Sea to the United Nations  
  Two United Nations Plaza, Room 434, New York, NY 10017  
  Telephone: (212) 963-3972

- **International Union for the Conservation of Nature and Natural Resources**
  
  Office of the Permanent Observer for the International Union for the Conservation of Nature and Natural Resources to the United Nations  
  801 Second Avenue, Suite 405 New York, NY 10017  
  Telephone: (212) 286-1076

- **League of Arab States**
  
  Office of the Permanent Observer for the League of Arab States to the United Nations  
  866 United Nations Plaza, Suite 494, New York, NY 10017  
  Telephone: (212) 838-8700

- **Organization of Islamic Cooperation**
  
  Office of the Permanent Observer for the Organization of Islamic Cooperation to the United Nations  
  320 East 51st Street
Partners in Population and Development

Office of the Permanent Observer for Partners in Population and Development to the United Nations
336 East 45th Street, 14th Floor, New York, NY 10017
Telephone (212)-286-1082

University for Peace

Office of the Permanent Observer for the University for Peace
551 Fifth Avenue, Suites 800 A-B
New York, N.Y. 10176
Telephone: (212) 346-1163

Intergovernmental organizations having received a standing invitation to participate as observers in the sessions and the work of the General Assembly and not maintaining permanent offices at Headquarters

- African, Caribbean and Pacific Group of States
- African Development Bank
- Agency for the Prohibition of Nuclear Weapons in Latin America and the Caribbean
- Andean Community
- Andean Development Corporation
- Asian Development Bank
- Association of Caribbean States
- Association of Southeast Asian Nations
- Black Sea Economic Cooperation Organization
- Central European Initiative
- Collective Security Treaty Organization
- Common Fund for Commodities
- Commonwealth of Independent States
- Community of Portuguese-speaking Countries
- Community of Sahelo-Saharan States
- Conference on Interaction and Confidence-building Measures in Asia
- Council of Europe
- Customs Cooperation Council
- East African Community
- Economic Community of Central African States

- Economic Community of West African States
- Economic Cooperation Organization
- Energy Charter Conference
- Eurasian Development Bank
- Eurasian Economic Community
- European Organization for Nuclear Research
- Global Fund to Fight AIDS, Tuberculosis and Malaria
- GUUAM
- Hague Conference on Private International Law
- Ibero-American Conference
- Indian Ocean Commission
- Inter-American Development Bank
- Intergovernmental Authority on Development
- International Centre for Migration Policy Development
- International Conference on the Great Lakes Region of Africa
- International Fund for Saving the Aral Sea
- International Humanitarian Fact-Finding Commission
- International Hydrographic Organization
- Islamic Development Bank Group
- Italian-Latin American Institute
- Latin American Economic System
- Latin American Integration Association
- Latin American Parliament
- OPEC Fund for International Development
- Organization for Economic Cooperation and Development
- Organization for Security and Cooperation in Europe
- Organization of American States
- Organization of Eastern Caribbean States
- Pacific Islands Forum
- Parliamentary Assembly of the Mediterranean
- Permanent Court of Arbitration
- Regional Centre on Small Arms and Light Weapons in the Great Lakes Region, the Horn of Africa and Bordering States
- Shanghai Cooperation Organization
- South Asian Association for Regional Cooperation
- Southern African Development Community
South Centre
Union of South American Nations
West African Economic and Monetary Union

Other entities having received a standing invitation to participate as observers in the sessions and the work of the General Assembly and maintaining permanent offices at Headquarters

International Committee of the Red Cross

Delegation of the International Committee of the Red Cross to the United Nations
801 Second Avenue,
18th Floor,
New York, NY 10017-4706
Telephone: (212) 599-6021

International Federation of Red Cross and Red Crescent Societies

Delegation of the International Federation of Red Cross and Red Crescent Societies to the United Nations
800 Second Avenue,
Suite 355 (Third Floor)
New York, NY 10017
Telephone: (212) 338-0161

International Olympic Committee

Office of the Permanent Observer for the International Olympic Committee to the United Nations
708 Third Avenue, 6th Floor New York, NY 10017
Telephone: (212) 209 3952

Inter-Parliamentary Union

Office of the Permanent Observer to the United Nations
220 East 42nd Street, Suite 3002, New York, NY 10017
Telephone: (212) 557-5880

Sovereign Military Order of Malta

Office of the Permanent Observer for the Sovereign Military Order of Malta to the United Nations
216 East 47th Street,
8th Floor,
New York, NY 10017
Telephone: (212) 355-6213/4601
Based on the United Nations Protocol's Blue Book
Last updated from A/INF/67/5 (26 December 2012)