

# Registries Stakeholder Group Statement



## Proposed Updates to the Trademark Clearinghouse Requirements

Date statement submitted: 26 January 2026

*(this is a copy of the comment submitted via the ICANN public comment platform)*

Reference url:

<https://www.icann.org/en/public-comment/proceeding/proposed-updates-to-the-trademark-clearinghouse-requirements-01-12-2025>

### Background<sup>1</sup>

This Public Comment proceeding seeks input on proposed updates to the TMCH Requirements. The TMCH Requirements describe the detailed requirements for registry operators in relation to their [Sunrise and Trademark Claims periods](#). Updates include the implementation of Sunrise Final Recommendation #8 from the [first phase](#) of a Policy Development Process (PDP) on a Review of All Rights Protection Mechanisms in All gTLDs and revisions to account for the next expansion of the gTLD space.

### Documents

- [Draft TMCH Requirements - December 2025 \(Clean\) \(pdf, 174.81 KB\)](#)
- [Draft TMCH Requirements - December 2025 \(Redline showing incremental changes against the February 2025 version\) \(pdf, 216.63 KB\)](#)
- [Draft TMCH Requirements - December 2025 \(Redline showing cumulative changes against the May 2014 version\) \(pdf, 242.35 KB\)](#)

### Related RySG comments

- [RySG comment on the GNSO Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process Phase1 Final Recommendations for ICANN Board Consideration](#) (May 2021)
- [Joint CPH comment on the Phase1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process](#) (May 2020)

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### Registries Stakeholder Group (RySG) comment

### Instructions

This guided submission form provides a list of questions seeking input from the community on the proposed updates to the Trademark Clearinghouse Rights Protection Mechanism Requirements (TMCH Requirements), developed to (i) implement Sunrise Final Recommendation #8 from the first phase of a Policy Development Process (PDP) on a Review of All Rights Protection Mechanisms in All gTLDs, and (ii) account for the next expansion of the generic top-level domain (gTLD) space. Community feedback will be reviewed and considered.

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<sup>1</sup> Background: intended to give a brief context for the comment and to highlight what is most relevant for RO's in the subject document – it is not a summary of the subject document.

**1. Do the revisions to Section 2.3.6 and the proposed draft language for the new Section 2.3.7, updated in accordance with Sunrise Recommendation #8, align with the recommendation and clearly outline the applicable requirements? If applicable, please explain your answer.**

**Yes**

**2. Do you have any comments or feedback on the updates made to the TMCH Requirements, specifically regarding the changes intended to account for the next expansion of the gTLD space? If applicable, please explain any concerns.**

**No**

**3. Do you have any comments or feedback on any of the other general updates included in the TMCH Requirements? If applicable, please explain any concerns.**

**No**

**4. Do you have any comments or feedback on the expected impacts to gTLD registry operators on the revised Base gTLD RA?**

**No**

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