

Registries Stakeholder Group Statement

Issue: **Draft Procedure for Community gTLD Change Requests**

Date statement submitted: **2 April 2018**

Reference URL: <https://www.icann.org/public-comments/community-gtld-change-procedure-2018-02-14-en>

Registries Stakeholder Group (RySG) comment:

The Registries Stakeholder Group (RySG) is submitting this comment on the Draft Procedure for Community gTLD Change Requests (the “Procedure”), though historically we have not weighed in on matters that directly involve a member. As some RySG members may be impacted by the availability of the Procedure, they are welcome to comment in their own capacity.

As noted in the public comment announcement, members of the RySG had provided input during the development of the Procedure. In fact, the Community gTLD Change Process Working Group engaged the RySG on multiple occasions to solicit feedback on the Procedure. Though several members of the RySG expressed concern that modifications to Specification 12 should be addressed as a contract matter between the Registry Operator and ICANN, and that Section 2.19 of a Community-based Registry Agreement explicitly provides for such “modifications to policies and practices for the TLD”, ICANN chose not to respect this contractual right.

Notwithstanding the above, the RySG supports the Procedure as written and believes it represents a fair and reasonable approach for a Registry Operator to amend Specification 12 to its Registry Agreement. We encourage ICANN to expedite development of the implementation plan to support the Procedure to avoid further delay of its availability to Registry Operators.
