

RySG comments on RA Amendment

The Registries Stakeholder Group (RySG) welcomes the publication of proposed changes to the Registry Agreement (RA) as a result of negotiations undertaken in accordance with the process specified in clause 7.7 of the RA. The RySG does not wish to comment on the specific amendments proposed to the RA, but rather ICANN's intent to not restate RAs to incorporate the final amendments, but rather to publish a final global amendment that will only contain the amended provisions.

The RySG has raised this issue with ICANN on a number of occasions and while we understand the administrative burden that will fall on ICANN to provide an amended and restated RA, we do not believe this is a valid reason not to do so.

The RySG concern is based in the potential problems and confusion that may arise from not having an authoritative version of each individual RA publicly available and we strongly encourage ICANN to work towards having amended and restated RAs published on the ICANN site. We strongly believe that the publication of restated RAs will increase transparency both for Registry Operators, who can more clearly access and review their full set of requirements under the RA, and for the public to understand what requirements apply to each Registry Operator.

We welcome discussion with ICANN regarding ways to alleviate any potential burden associated with the publication of restated RAs, so that Registry Operators and the public can see these benefits through.