

Draft Expressions of Interest/Pre-Registrations Model
Comments of the Registries Stakeholder Group
January 27, 2010

The Registries Stakeholder Group (RySG) of the GNSO is pleased to provide this statement in response to ICANN's request for comments on the Draft Expressions of Interest/Pre-Registrations Model for new generic top-level domains (new gTLDs) posted on 18 December 2009 at <http://www.icann.org/en/topics/new-gtlds/eoi-model-18dec09-en.pdf> . The comments that follow represent a consensus position of the RySG as further detailed at the end of the document.

We believe that the proposed model correctly honors the intent of the GNSO new gTLD recommendations that there should be a communications period of at least four months and that the applicant guidebook should be very close to complete before that period begins. Therefore, the communication period must not begin until all major issues are very close to final resolution; this includes the four overarching issues, the issue of vertical integration of registries and registrars, and the registry base agreement.

If participation in the Expressions of Interest (EOI) is mandatory, it must not start until after the communication period ends. To do otherwise would significantly disadvantage potential applicants who are not ICANN insiders and would go directly against the intent of the GNSO recommendation for the communications period.

We disagree with the plan to publicly communicate proposed strings. Useful data regarding the new gTLDs can be obtained without disclosing the strings themselves. Any potential applicants are of course free to communicate their strings themselves, but there likely will be cases where revealing strings will have the potential of compromising business plans and cause gaming of the system.

Finally, the RySG strongly believes that more time and more public participation is needed to complete the work on the EOI. It is not ready for submission to the ICANN Board meeting in

February, and the entire proceeding should be placed on the agenda for the next ICANN public meetings when a full public consultation can be scheduled.

GNSO gTLD Registry Stakeholder Group Statement of Support with regard to These Comments

A supermajority of 12 RySG members supported this statement:

- Total # of eligible RySG Members¹: 15
- Total # of RySG Members: 14
- Total # of Active RySG Members²: 14
- Minimum requirement for supermajority of Active Members: 10
- Minimum requirement for majority of Active Members: 8
- # of Members that participated in this process: 14
- Names of Members that participated in this process:
 1. Afilias (.info)
 2. DotAsia Organisation (.asia)
 3. Dot Cooperation LLC (.coop)
 4. Employ Media (.jobs)
 5. Fundació puntCAT (.cat)
 6. mTLD Top Level Domain (.mobi)
 7. Museum Domain Management Association – MuseDoma (.museum)
 8. NeuStar (.biz)
 9. Public Interest Registry - PIR (.org)
 10. RegistryPro (.pro)
 11. Société Internationale de Télécommunication Aéronautiques – SITA (.aero)
 12. Telnic, Limited (.tel)

¹ All top-level domain sponsors or registry operators that have agreements with ICANN to provide Registry Services in support of one or more gTLDs are eligible for membership upon the “effective date” set forth in the operator’s or sponsor’s agreement (Article III, Membership, ¶ 1). The RySG Articles of Operations can be found at http://www.gtldregistries.org/about_us/articles .

² Per the RySG Articles of Operations, Article III, Membership, ¶ 4: Members shall be classified as “Active” or “Inactive”. A member shall be classified as “Active” unless it is classified as “Inactive” pursuant to the provisions of this paragraph. Members become Inactive by failing to participate in a Constituency meeting or voting process for a total of three consecutive meetings or voting processes or both, or by failing to participate in meetings or voting processes, or both, for six weeks, whichever is shorter. An Inactive member shall have all rights and duties of membership other than being counted as present or absent in the determination of a quorum. An Inactive member may resume Active status at any time by participating in a Constituency meeting or by voting.

13. Tralliance Registry Management Company (TRMC), (.travel)
14. VeriSign (.com, .net & .name)

- Names & email addresses for points of contact:
 - a. Chair: David Maher, dmaher@pir.org
 - b. Alternate Chair: Jeff Neuman, Jeff.Neuman@Neustar.us
 - c. Secretariat: Cherie Stubbs, Cherstubbs@aol.com

Regarding the issue noted above, the level of support in the RySG for the Constituency statement is summarized below.

1. **Level of Support of Active Members:** Supermajority
 - 1.1. # of Members in Favor: 13³
 - 1.2. # of Members Opposed: 0
 - 1.3. # of Members that Abstained: 1
 - 1.4. # of Members that did not vote: 1
2. **Minority Position(s):** N/A

³ Note that MuseDoma voted in support of this statement after it had been submitted to ICANN.