

Registries Stakeholder Group Statement

Issue: **Competition, Consumer Trust, and Consumer Choice Review Team - New Sections to Draft Report of Recommendations**

Date statement submitted: **15 January 2018**

Reference URL: <https://www.icann.org/public-comments/cct-recs-2017-11-27-en>

Background¹

- The purpose of the 2nd call for input is to gather community input on **new sections that have been added to the draft report.**
- The CCTRT plans to publish its final report in Q1 2018.
- The new sections pertain to
 - **DNS Abuse**
Based on: *Statistical analysis of DNS abuse in gTLDs* ([link to study](#))
(RySG commented on this analysis: [link to RySG comment](#))
 - **Cost to trademark holders**
Based on a survey by the International Trademark Association INTA ([link](#))
 - **Parking and consumer choice**
- **New Sections to the CCTRT draft report:** <https://www.icann.org/en/system/files/files/cct-rt-draft-recs-new-sections-27nov17-en.pdf>
- CCTRT Draft report March 2017 ([link to report](#))
RySG comment on the March 2017 Draft Report: [link to RySG comment](#)

Registries Stakeholder Group (RySG) comment:

I. Introduction

The unprecedented size and scope of namespace expansion resulting from the New Generic Top-Level Domain (gTLD) Program makes review of *any* of its components a significant and challenging undertaking. The RySG commends and thanks the CCTRT for its hard work and dedication to fulfilling a key element of the Affirmation of Commitments (AoC) by conducting this review.

¹ *Background:* intended to give a brief context/summary and to highlight what is most relevant for RO's in the subject document.

II. Key Issues

- **The RySG strongly opposes Recommendation B.** Specification 11 of the new gTLD Registry Agreement states that new gTLD Registry Operators may only use ICANN-accredited registrars. To the extent that this recommendation pertains to new gTLD registries, that would put ICANN org in the position of endeavoring to prevent the use of registrars that it accredits, which will likely violate a registry's equal access obligations. This recommendation attempts to force gTLD registries to do what ICANN cannot: indirectly control resellers. ICANN must not shift its Contractual Compliance responsibilities to ROs, which this Recommendation effectively seeks to do.
- **The RySG strongly disagrees with the proposal to create a DNS Abuse Dispute Resolution Procedure (DADRP)** and supports the rationale of the Minority Statement included in the report. The proposal is premised upon the false assumption that registries are directly responsible for abuse within their TLDs; however, registries generally have no direct relationship with registrants and little control over how domains are used once registered. As is acknowledged in the CCT-RTs own report, registry-level safeguards have proven ineffective at reducing DNS abuse. Further, registries with the concentrations of abuse contemplated within the section are a small few, and are readily identifiable without relying upon a third party trigger. Improvements should be made to the existing compliance function rather than relying upon a whole new procedure to handle enforcement in a very narrow subset of cases, where there is no evidence that such a procedure is necessary or would be effective in achieving its intended aim. The alternative of creating the DADRP creates uncertainty and potential operational burden for registries without clear benefit.

II. Comments on the Recommendations

Chapter: Introduction to the Competition and Consumer Choice Analysis

Recommendation 5: (red = new text)
Collect parking data.

Rationale/related findings: The high incidence of parked domains suggests an impact on the competitive landscape, but insufficient data frustrates efforts to analyze this impact.

Details: ICANN should regularly track the proportion of TLDs that are parked with sufficient granularity to identify trends on a regional and global basis. Future reviews should conduct further analyses of whether there is a correlation between parked domains and renewal rates or other factors that may affect competition. Further analysis should be performed on the relationship between parking and DNS abuse.

Success Measures: The availability of relevant data for use by the ICANN organization, contractors and the ICANN community for its work in evaluating competition in the DNS space.

To
ICANN
organization

Priority level
High

RySG comment on March 2017 report:

The RySG obviously is in favor of increasing usage. However, while this data could be useful, it's unclear how, in the end, it would be put to use by the ICANN organization or the community.

RySG comment on new sections:

The various studies that the CCT-RT undertook to measure the impact of parking on both competition and rates of DNS abuse returned inconclusive results. The new sections of the report put forth a number of possible hypotheses that could be explored, but which have no demonstrable, concrete bases. Given the absence of a documented problem, the RySG believes additional studies on parking are unnecessary at this time and are an ineffective use of ICANN's shrinking resources.

To the extent ICANN adopts this recommendation and dedicates resources to study parking further, the RySG recommends that ICANN take a critical approach and scrutinize the utility and validity of those studies, without pre-supposing the outcomes of any studies.

Chapter: Safeguards (new recommendation)

Recommendation A:

Consider directing ICANN org, in its discussions with registries, to negotiate amendments to existing Registry Agreements, or in negotiations of new Registry Agreements associated with subsequent rounds of new gTLDs, to include provisions in the agreements to provide incentives, including financial incentives, to registries, especially open registries, to adopt proactive anti-abuse measures.

Rationale/related findings: The new gTLD safeguards alone do not prevent technical abuse in the DNS. Abuse rates are correlated to registration restrictions imposed on registrants and registration prices may influence rates too. Some registries are inherently designed to have strict registration policies and/or high prices. However, a free, open, and accessible Internet will invariably include registries with open registration policies and low prices that must adopt other measures to prevent technical DNS abuse. Registries that do not impose registration eligibility restrictions can reduce technical DNS abuse through proactive means such as identifying repeat offenders, monitoring suspicious registrations, and actively detecting abuse instead of merely waiting for complaints to be filed. Therefore, ICANN should incentivize and reward the implementation of proactive anti-abuse measures by such registry operators to reduce technical DNS abuse in open gTLDs.

Details: The ICANN Board should consider urging ICANN org to negotiate with registries to include in the registry agreements fee discounts available to registry operators with open registration policies that implement proactive measures to prevent technical DNS abuse in their zone.

To
ICANN Board, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization and the Subsequent Procedures PDP WG

Priority level
High

[RySG comment on new recommendation:](#)

The RySG supports recognizing and supporting the many ROs that take steps to discourage abuse, but opposes amending the RA as recommended, to mandate or incentivize ‘proactive’ anti-abuse measures.

This recommendation raises a number of questions, including what types of anti-abuse measures would qualify for what types of incentives. Without a clear, agreed-upon definition of abuse, this could be challenging. Coming to such a definition will, as the RySG knows from experience, be a long, complex process; following which, the parties must negotiate the relevant registry agreement amendments.

While good actors will ensure proper countermeasures are in place when engaging in lower price selling, there is no guarantee that existing bad actors would take advantage of such incentives, or live up to their obligations under any such program, resulting in no net improvement to the current situation.

With particular reference to the suggested inclusion of proactive abuse mitigation within the Registry Agreement, it is noted that such contractual obligations may have the potential to create an increased risk of legal liability for the registry operator. Should contracted parties accept a financial

benefit in return for undertaking proactive abuse mitigation, a substantial risk occurs that should they fall short in this task (fail to discover (an) abuse(s), which may cause harm or loss (e.g. phishing, malware dissemination, botnet/C&C)). A registry operator, having accepted a specifically preventative responsibility in their RA, would be at a distinct legal disadvantage if attempting to disclaim liability, were they joined to any action arising out of such an abuse.

Chapter: Safeguards (new recommendation)

Recommendation B:

Consider directing ICANN org, in its discussions with registrars and registries, to negotiate amendments to the Registrar Accreditation Agreement and Registry Agreements to include provisions aimed at preventing systemic use of specific registrars for technical DNS abuse.

Rationale/related findings: Current policies focus on individual abuse complaints. However, registrars and registry operators associated with extremely high rates of technical DNS abuse continue operating and face little incentive to prevent technical DNS abuse. Moreover, there currently exist few enforcement mechanisms to prevent systemic domain name abuse associated with resellers. Systemic use of particular registrars and registries for technical DNS abuse threatens the security and stability of the DNS, the universal acceptance of TLDs, and consumer trust.

Details: The ICANN Board should consider directing ICANN org to negotiate amendments to the Registrar Accreditation Agreement and Registry Agreement provisions aimed at preventing systemic use of specific registrars for technical DNS abuse. Such language should impose upon registrars, and their affiliated entities such as resellers, a duty to mitigate technical DNS abuse, whereby ICANN may suspend registrars and registry operators found to be associated with unabated, abnormal and extremely high rates of technical abuse. ICANN must base such findings on multiple verifiable reliable sources and such findings may be rebutted by the registrar upon sufficient proof that the findings were inaccurate. The following factors may be taken into account when making a determination: whether the registrar or registry operator 1) engages in proactive anti-abuse measures to prevent technical DNS abuse, 2) was itself a victim in the relevant instance, 3) has since taken necessary and appropriate actions to stop the abuse and prevent future systemic use of its services for technical DNS abuse.

To
ICANN Board, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization and the Subsequent Procedures PDP WG

Priority level
High

[RySG comment on new recommendation:](#)

The RySG strongly opposes this Recommendation. Specification 11 of the new gTLD Registry Agreement states that new gTLD Registry Operators may only use ICANN-accredited registrars. To the extent that this recommendation pertains to new gTLD registries, that would put ICANN org in the position of endeavoring to prevent the use of registrars that it accredits, which will likely violate a registry's equal access obligations. This recommendation attempts to force gTLD registries to do what ICANN cannot: indirectly control resellers. ICANN must not shift its Contractual Compliance responsibilities to ROs, which this Recommendation effectively seeks to do.

Introducing additional policies or provisions to promote behavior beyond what is already mandated in registry and registrar agreements suggests that current enforcement of existing policies should be prioritized. If bad actors are identified, action should be taken by ICANN to discipline or de-accredit those actors, as occurs with other breaches of ICANN's agreements.

Furthermore, the RySG opposes any scheme in which a contracted party is deemed guilty until it proves its innocence. ICANN has shown a great

willingness through its DAAR program to consider third-party (“3P”) abuse monitoring services to be “multiple verifiable reliable sources” when these 3P sources have not been vetted or reviewed by the community. ICANN must not suspend a contracted party and potentially destroy its reputation, based solely on 3P sources.** This is particularly true for ROs that are, or are affiliates of, publicly traded companies. ICANN’s willingness to do – especially where ICANN org has repeatedly stated its refusal to accept any liability for this potential damage – is irresponsible and inconsistent with ICANN’s bylaws. The RySG strongly objects to placing the business and reputations of contracted parties at the whim, error, or (mis)interpretation of 3Ps.

The CCT-RT must take into account that each of the 3P sources ICANN uses for DAAR has its own, independent (i.e. not controlled by any standards organization) definition of abuse. So does each contracted party. No community-defined process exists to classify a 3P abuse report of conduct that violates the 3P’s “abuse” definition, but does not violate the relevant contracted party’s “abuse” definition. ICANN must openly and transparently identify how it will address these and other concerns before it releases and relies upon DAAR.

Chapter: Safeguards (new recommendation)

Recommendation C:

Further study the relationship between specific registry operators, registrars and DNS abuse by commissioning ongoing data collection, including but not limited to, ICANN Domain Abuse Activity Reporting (DAAR) initiatives. For transparency purposes, this information should be regularly published in order to be able to identify registries and registrars that need to come under greater scrutiny and higher priority by ICANN Compliance. Upon identifying abuse phenomena, ICANN should put in place an action plan to respond to such studies, remediate problems identified, and define future ongoing data collection.

Rationale/related findings:

The DNS Abuse Study commissioned by the CCT-RT identified extremely high rates of abuse associated with specific registries and registrars as well as registration features, such as mass registrations, which appear to enable abuse. Moreover, the Study concluded that registration restrictions correlate with abuse, which means that there are many factors for which to account in order to extrapolate cross-TLD abuse trends for specific registry operators and registrars. The DNS Abuse Study has highlighted certain behaviors that are diametrically opposed to encouraging consumer trust in the DNS. Certain registries and registrars appear to either positively encourage or at the very least willfully ignore DNS abuse. Such behavior needs to be identified rapidly and action must be taken by ICANN compliance as deemed necessary.

Details: The additional studies need to be of an ongoing nature, collecting relevant data concerning DNS abuse at both the registrar and registry level. The data should be regularly published, thereby enabling the community and ICANN compliance in particular to identify registries and registrars that need to come under greater compliance scrutiny and thereby have such behavior eradicated.

To
 ICANN Board, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization and the Subsequent Procedures PDP WG, SSR2 Review Team

Priority level
 High

[RySG comment on new recommendation:](#)

The RysG supports the recommendation that ICANN conduct ongoing research on DNS abuse, but cautions against using the DNS Abuse Study to come to any conclusions and strongly opposes the use and publication of data from DAAR.

While the RySG respects the intent and efforts of the researchers who conducted the DNS Abuse Study, the RySG believes the study is flawed and it should not be the basis for any decisions. These flaws include: The study is self-referencing and in many cases only references prior work by the same authors (see the Reference list in the study where the authors repeatedly quote themselves). The study makes conclusions for which it provided no data or analysis in the text (despite no data about price, and only mentioning price twice as a sidenote, the study concludes that lower prices might be linked to abuse). The study circularly relies on the statements of the tools it chose to use (i.e. citation to Spamhaus itself for its assertion that Spamhaus is a

“near zero false positive list”).

The RySG is not opposed to ongoing anonymized data collection to learn more about abusive behaviors but strongly recommends that the researchers chosen be required to provide clear reports that link every conclusion to a specific data point and analysis. Even though the RySG does note that the report contains some positive, and well-researched findings based on data (such as the findings that most new gTLDs are not havens for abuse or malware), the quality of the study is lacking enough that care should be taken when interpreting all of the results.

Furthermore, as mentioned previously, ICANN has created DAAR behind closed doors, with no community consultation, and determined which 3Ps data feeds it will rely on, without input from the community. ICANN has apparently, in determining how “trusted” these 3Ps are, relied on the cost-benefit-risk analysis of corporate IT departments that pay for filtering rather than the needs and interests and concerns of the community, and particularly contracted parties. Although there is much benefit to be had in establishing reliable tools for the measurement and mitigation of abuse, which it is assumed is the ultimate aspiration for the DAAR project, any current reliance on DAAR is exceptionally premature. The CCT-RT should not recommend use of DAAR to monitor or police contracted parties, until the community has had a chance to discuss and debate the impact, benefits and risks to the various constituencies. In particular, the CCT-RT should not recommend that ICANN publish the data from DAAR until there is a mechanism in place for addressing community concerns that does not jeopardize the reputation or business of the RO without a fair and impartial investigation, and ICANN acknowledges its potential liability for reliance on DAAR.

Chapter: Safeguards (new recommendation)

Recommendation D:

A DNS Abuse Dispute Resolution Policy ("DADRP") should be considered by the community to deal with registry operators and registrars that are identified as having excessive levels of abuse (to define, e.g. over 10% of their domain names are blacklisted domain names). Such registry operators or registrars should in the first instance be required to a) explain to ICANN Compliance why this is, b) commit to clean up that abuse within a certain time period, and / or adopt stricter registration policies within a certain time period. Failure to comply will result in a DADRP, should ICANN not take any action themselves.

Rationale/related findings: The DNS Abuse Study commissioned by CCT-RT identified extremely high rates of abuse associated with specific registries. It is important to have a mechanism to deal with this abuse, particularly if it's prevalent in certain registries. Abusive behavior needs to be eradicated from the DNS and this would provide an additional arm to combat that abuse.

Consensus within team: Majority consensus but not unanimity (see Minority Statement in Appendix 6.1 Minority Statements)

Details: ICANN Compliance is one route to dealing with this high level of DNS abuse, enforcing existing and any amendments to the Registrar Accreditation Agreement to prevent systemic use of specific registrars for technical DNS abuse as per Recommendation 2. However, in addition, a specific DADRP should be considered as it could also be very helpful in dealing with such DNS abuse, and it could also serve as a significant deterrent and help prevent or minimize such high levels of DNS abuse. Registry operators or registrars that are identified as having excessive levels of abuse (to be defined, for example where a registry operator has over 10% of their domain names blacklisted by one or more heterogeneous blacklists (StopBadware SDP, APWG, Spamhaus, Secure Domain Foundation, SURBL and CleanMX). A DADRP should set out specific penalties. Examples from the DNS Abuse Study of new gTLDs with over 10% of their domain names blacklisted, according to Spamhaus for example are .SCIENCE (51%), .STREAM (47%), .STUDY (33%), .DOWNLOAD (20%), .CLICK (18%), .TOP (17%), .GDN (16%), .TRADE (15%), .REVIEW (13%), and .ACCOUNTANT (12%). Thus, each of these registries should be obliged to review their second level domain names being used for DNS abuse and explain why this is, commit to cleaning these up within a certain timeframe, and adopt stricter registration policies if necessary to ensure that there exist relevant contractual terms to effectively handle such registrations. If the domain names at issue are not cleaned up satisfactorily, and in the event ICANN does not take immediate action, then a DADRP may be brought by an affected party. The process should involve a written complaint to the registry, time allotted for a response from the registry, and an oral hearing. Final decisions should be issued by an expert panel which could recommend one or more enforcement mechanisms to be agreed upon by the community.

For purposes of this recommendation, a registrar acting under the control of a registry operator would be covered by the DADRP so it is important to ensure that "registry operator" shall include entities directly or indirectly controlling,

To
 ICANN Board, the Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization and the Subsequent Procedures PDP WG, SSR2 Review Team

Priority level
 High

controlled by, or under common control with, a registry operator, whether by ownership or control of voting securities, by contract or otherwise where 'control' means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity, whether by ownership or control of voting securities, by contract or otherwise.		
---	--	--

[RySG comment on new recommendation:](#)

The RySG strongly disagrees with the proposal to create a DNS Abuse Dispute Resolution Procedure (DADRP) and supports the rationale of the Minority Statement on this Recommendation.

We have concerns about committing registry operators to be bound to a new DRP when our contracts with ICANN already require that we take measures to mitigate abuse. The DADRP proposal is premised upon the false assumption that registries are directly responsible for abuse within their TLDs; however, registries generally have no direct relationship with registrants and little control over how domains are used once registered. As is acknowledged in the CCT-RTs own report, registry-level safeguards have proven ineffective at reducing DNS abuse. Further, registries with the concentrations of abuse contemplated within the section are a small few, and are readily identifiable without relying upon a third party trigger. Improvements should be made to the existing compliance function rather than relying upon a whole new procedure to handle enforcement in a very narrow subset of cases, where there is no evidence that such a procedure is necessary or would be effective in achieving its intended aim. The alternative of creating the DADRP creates uncertainty and potential operational burden for registries without clear benefit.

We also refer again to the over reliance on 'blacklists' in this context. Whereas it can be accepted that data sourced from blacklists are useful as red flag indicators, the actual data remain formally unverified, and underlying evidence remains largely unavailable to any affected party. Its with much dismay that we note the continued justification for the use of such sources based on nebulous concepts such as 'widespread use' and 'reputation', rather than on actual sound verification of the underlying data. It has been publicly accepted by ICANN Compliance (ICANN 60 DNS Abuse Reporting & Mitigation Session) that the use of such blacklists alone at the aggregate level, would not be deemed sufficient to ground contractual enforcement, and as such it is inappropriate to suggest that the same sources are somehow suitable to similarly ground a DRP.

Developing this DADRP would require a significant outlay of time, energy and resources from the community – especially considering that there is no clear definition of "abuse" – with little obvious benefit or return on that effort. In addition, this recommendation raises the possibility of involving a third party in the interpretation of our contracts, which is a proposition that the RySG cannot support. Any such step would require a GNSO PDP, at a minimum.

Chapter. Safeguards

Recommendation 40: (red = new text)

~~This Full Impact Study~~ **An Impact Study** to ascertain the impact of the New gTLD Program on the cost and effort required to protect trademarks in the DNS should be repeated at regular intervals to see the evolution over time as the New gTLD Program continues to evolve and new gTLD registrations increase. We would specifically recommend that the next Impact Survey be completed within 18 months after issuance of the CCTRT final report, and that subsequent studies be repeated every 18 to 24 months. **The CCTRT acknowledges the fact that this was carried out in 2017 by Nielsen surveying INTA members and we encourage that to continue noting that the study needs to be more user friendly.**

Rationale/related findings:

Costs will likely vary considerably over time as new gTLDs are delegated and registration levels evolve. Repeating the Impact Study would enable a comparison over time.

Details: The evolution over time will provide a more precise picture of costs as they evolve and track the effectiveness of RPMs generally in the Domain Name System.

Success Measures: The results of such Impact Studies would provide significantly more data to the relevant working groups currently looking into RPMs and the TMCH as well as future ones, thereby benefitting the community as a whole. Recommendations would then also be able to evolve appropriately in future CCT Review Teams.

To
ICANN organization

Priority level
High

RySG comment on March 2017 report: -

RySG comment on new sections:

The RySG recognizes the value in conducting this type of impact study, and that the complexity of the INTA Impact Study made it difficult for many respondents to complete the questionnaire.

Going forward, ICANN should take steps to ensure that any studies conducted are optimized to solicit meaningful and statistically significant data from a representative sample of respondents.

Chapter. Safeguards

Recommendation 41: (red = new text)

A full review of the URS should be carried out and consideration be given to how it should interoperate with the UDRP. However, given the PDP Review of All Rights Protection Mechanisms in All gTLDs, which is currently ongoing, such a review needs to take on board that report when published and indeed may not be necessary if that report is substantial in its findings and if the report fully considers potential modifications.

Rationale/related findings: The uptake in use of the URS appears to be below expectations, so it would be useful to understand the reasons for this and whether the URS is considered an effective mechanism to prevent abuse. It is also important for all gTLDs to have a level playing field. The PDP Review of All Rights Protection Mechanisms in All gTLDs, which is running in parallel to this ccT Review Team, will contribute to this consideration with its report due in 2018. ~~is due to consider the URS during spring or early summer 2017 with a final report scheduled for January 2018. It would seem to be diluting resources to create a separate review of the URS without the clarity of the PDP Review of All Rights Protection Mechanisms in All gTLDs.~~ That Working Group's report needs to be considered to set the scope of any review and potential modifications.

Details: A review of the URS should cover potential modifications inter alia (1) whether there should be a transfer option with the URS rather than only suspension; (2) whether two full systems should continue to operate (namely UDRP and URS in parallel) considering their relative merits, (3) the potential applicability of the URS to all gTLDs and (4) whether the availability of different mechanisms applicable in different gTLDs may be a source of confusion to consumers and rights holders.

Success Measures: Based on the findings, a clear overview of the suitability of the URS and whether it is functioning effectively in the way originally intended.

To
RPM PDP Working
Group

Generic Names
Supporting
Organization

Priority level
Prerequisite

RySG comment on March 2017 report:

What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?

RySG comment on new sections:

It appears that this recommendation is already being followed through the work of the RPM PDP WG, which is reviewing the URS.

In support of ICANN's policy development process, and for the sake of avoiding duplication of efforts, the RySG believes that allowing the RPM PDP WG to proceed with its work is sufficient to meet this recommendation. However, the RySG notes that the CCT-RT has only provided a list of suggestions, but no information as to what issues or problems led to them. We believe it would be very helpful to the RPM PDP to include a reason for each suggestion. We trust that the GNSO Council will duly consider the findings and recommendations that the RPM PDP WG produces in its Final Report regarding its phase one review of new gTLD RPMs.

Chapter. Safeguards

<p>Recommendation 42: (red = new text) A review of the Trademark Clearinghouse (TMCH) and its scope should be carried out to provides us with sufficient data to make recommendations and allow an effective policy review.</p>		
<p>Rationale/related findings: It seems likely that a full A cost-benefit analysis and review of the TMCH is necessary. The effectiveness of the TMCH appears to be in question. The dra report of Trademark Clearinghouse Independent Review of 25 July 2016 has not been able to make definitive conclusions due to data limitations. We need to await the final report of that Independent Review to finalize our recommendations. It is hoped that the INTA Impact Study will also provide useful data in that respect. Indeed the PDP Review of All Rights Protection Mechanisms in All gTLDs, which is running in parallel to this CCT Review Team, will contribute to this consideration with its report due January 2018. That Working Group’s report needs to be considered to set the scope of any review and potential modifications.</p> <p>Details: There appears to be considerable discussion and comment on whether the TMCH should be expanded beyond applying to only identical matches and if it should be extended to include “mark+keyword” or common typographical errors of the mark in question. If an extension is considered valuable, then the basis of such extension needs to be clear.</p> <p>Success Measures: The availability of adequate data to make recommendations and allow an e ective policy review of the TMCH.</p>	<p>To RPM PDP Working Group Generic Names Supporting Organization</p>	<p>Priority level Prerequisite</p>
<p><u>RySG comment on March 2017 report:</u> We agree with a review of the TMCH—it was lauded as a system that would be put to extensive use by rights holders, but that is far from the actual case. What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?</p>		
<p><u>RySG comment on new sections:</u> The RySG respectfully requests that the CCT-RT provide additional detail about how it believes such a cost-benefit analysis should be undertaken and what specific value it would add to the extensive evaluation of the TMCH already being undertaken by the RPM PDP WG.</p> <p>While the RPM PDP WG has been reviewing the TMCH, it has not engaged in any specific cost-benefit analysis. Given that the WG is still underway, in order for the GNSO to be able to adopt this recommendation, additional guidance from the CCT-RT would be helpful.</p> <p>The RySG also requests that the CCT-RT consider balancing the benefits of such an analysis with the time and resources required to undertake it.</p>		