



3/29/2018

Dear ICANN,

**Re: .eco Registry Comment on Draft Procedure for Community gTLD Change Requests**

The .eco Registry is pleased to see progress towards full implementation of the process envisioned in the Applicant Guidebook for ongoing accountability to our community.

Accountability is a key aspect of ICANN's work. Implementing the mechanisms for community TLDs to make it a priority for their members should also be a matter of course.

The .eco Registry recalls that section 4.2.3 of the Applicant Guidebook (AGB) states:

"The restrictions and corresponding enforcement mechanisms proposed by the applicant should show an alignment with the community-based purpose of the TLD and demonstrate continuing accountability to the community named in the application." (emphasis added)

A critical aspect of demonstrating ongoing accountability is a means to respond to requests from the community to align the registration policies of a registry with the community, especially when those requests are driven by the community served by that TLD.

Further, section 2.19 of the Registry Agreement States:

"Registry Operator shall operate the TLD in a manner that allows the TLD community to discuss and participate in the development and modification of policies and practices for the TLD." (emphasis added)

It is clear from these statements that implementation of this Change Request Procedure currently under public comment is a matter that was agreed on by the ICANN Board when the AGB was adopted in June 2012.

Indeed, the Board has contractually obliged community registries to make use of it over time. We therefore support this process and encourage ICANN and the community to conclude it efficiently and successfully.

Best regards,

Jacob

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