



**NABP**

National Association of  
Boards of Pharmacy

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TO: ICANN Global Domains Division  
FROM: National Association of Boards of Pharmacy  
DATE: March 30, 2018  
RE: Comments in Response to Draft Procedure for Community gTLD Change Requests

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Thank you for the opportunity to submit comments regarding the Draft Procedure for Community gTLD Change Requests, released on 14 February 2018. The National Association of Board of Pharmacy® (NABP®) supports the draft procedure as an appropriate mechanism for Community registry operators to implement modifications to Specification 12 of their Registry Agreements (RA).

As registry operator for the Community generic Top-Level Domain (gTLD) .pharmacy, NABP recognizes the need for a process that enables changes to Specification 12 of the RA. This capability would allow Community Registry Operators to keep pace with the evolving needs of the communities they serve. NABP also appreciates that any such changes should remain consistent with the original scope and mission of the Community gTLD and should not release the Registry Operator from its commitment to the community it represents. NABP believes that the draft policy appropriately takes these considerations into account and offers a clear and fair path forward.

In earlier discussions of a potential change process, stakeholders expressed concern that allowing changes to Specification 12 would enable Community Registry Operators to shirk the commitments they made in their initial applications to serve a specific group, ie, the commitments that entitled them to Community Priority Evaluation. The current draft procedure effectively prevents “gaming” by limiting the type, scope, and circumstances under which modifications can be made. Importantly, the draft procedure prohibits “changes that would remove the Community Registration Policies, excessively broaden or narrow registrant eligibility and/or name selection requirements, or result in significant negative impact to the TLD Community.”

Community gTLDs have an obligation to serve the interests of the communities they were conceived of and approved to represent. It is therefore appropriate that change requests must be accompanied by documentation of support for the change by the TLD Community, as well as by the representative governing bodies, as specified in section 2.1 of the draft procedure. The ICANN Review, described in section 3.1 of the draft procedure, establishes clearly delineated criteria for evaluating change requests. Appropriately, these criteria require demonstrated support of, and benefit to the TLD community. Further, the draft procedure aligns with ICANN’s multistakeholder model of governance

by including an opportunity for comments on the change request from the broader internet community.

NABP congratulates the Community gTLD Change Request Process Working Group for developing a viable procedure and encourages the ICANN organization to adopt and implement it without further delay.

[NABP](#) is the independent, international, and impartial association that assists its member boards and jurisdictions for the purpose of protecting the public health. NABP is also the registry operator for the [.pharmacy](#) TLD, as well as a founding member of the Verified Top-Level Domains [Consortium](#). As a verified TLD, [.pharmacy](#) identifies online pharmacies and pharmacy-related websites around the globe as safe and legitimate.