



April 29, 2019

ICANN

12025 Waterfront Drive, Suite 300

Los Angeles, CA 90094

Attn: Russ Weinstein, Global Domains Division

To the ICANN Staff and Board:

The undersigned non-profit organizations write to express our opposition to the removal of price caps in the .org Registry Agreement (the ".org Agreement").

We agree with the current .org registry operator, the Public Interest Registry, that the .org gTLD "has assumed the reputation as the domain of choice for organisations dedicated to serving the public interest."<sup>1</sup> We have come to rely on this reputation to help distinguish the online presence of our organizations from the online presence of organizations that are not intended to serve the public interest. As nonprofit organizations, we also have come to rely on the certainty and predictability of reasonable domain name registration expenses when allocating our limited resources.

We therefore are disappointed and concerned that ICANN has proposed removing price caps from the .org Agreement. The reasonable expectation of .org registrants was, and continues to be, that prices would remain capped to ensure stable and reasonable domain name pricing for the millions of nonprofit organizations that have invested in a .org web presence. These organizations put their trust in ICANN as caretaker of the public interest in the .org name space.

If the existing price caps are removed, there will be no limits on the prices the Public Interest Registry can charge, and any wholesale cost increases imposed by the registry likely will be passed on to .org registrants such as the organizations we represent. This will accordingly introduce new budgetary uncertainty to the class of organizations that can least afford such uncertainty. Every additional dollar earmarked for domain name registrations is a dollar that is not available to advance the public interest purpose of nonprofit registrants that use the .org name space. While it is possible the Public Interest Registry may choose not to raise prices, despite the removal of the caps, the .org registry is too important to leave this decision to the registry's discretion.

ICANN has articulated no compelling policy basis for this proposed change. Instead, ICANN has represented that the intent is just to bring the .org Agreement into conformity with the base registry agreement used by ICANN with respect to other gTLDs not set aside for organizations that serve the public interest. This strikes us as conformity for its own sake. ICANN should not disregard the public interest in favor of administrative convenience. Moreover, the Public Interest Registry is a nonprofit organization itself, and there is no evidence that it needs to somehow compete with for-profit registries, or that it needs unlimited additional funds to continue to operate as it has.

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<sup>1</sup> <https://pir.org/about-us/history/>

The .org gTLD is in a unique position as the presumed domain space for public interest organizations – a domain space that was created to benefit the public. ICANN has an obligation to ensure that the name space and the governing .org Agreement continue to reflect the public interest objectives of its constituency.

We hope that ICANN will reconsider this proposal and ensure that price caps are retained in the final agreement.

Sincerely,

**NPR**



Briana E. Thibau, Deputy General Counsel

**YMCA OF THE USA**

Karyn Boston, Executive Vice President and Chief Legal Officer

**C-SPAN**

Bruce D. Collins, Corp. VP & General Counsel

**National Geographic Society**

Angelo M. Grima, EVP, General Counsel & Secretary

**AARP**

Leslie Nettleford, Associate General Counsel

**The Conservation Fund**

Holly Cannon, Executive Vice President and General Counsel

**Oceana**

Eric A. Bilsky, Assistant General Counsel

**National Trust for Historic Preservation**

Paul W. Edmondson, Interim President and CEO