

Registrar Comment on PUBLIC COMMENT REVIEW AND DISCUSSION REQUIRED:
GNSO Community Comment 2 (CC2) on New gTLD Subsequent Procedures Policy
Development Process

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to comment on the GNSO Community Comment 2 (CC2) on New gTLD Subsequent Procedures Policy Development Process. The registrars have essentially been on the front lines during the implementation of the latest round of nTLDs and are well positioned to evaluate the challenges they and their RNHs have faced and provide comments on how any subsequent rounds could potentially alleviate these challenges.

Proposed RSP program. While the RrSG welcomes innovation and we have seen multiple new business models come out of the current nTLD program, the RrSG encourages ICANN to concurrently consider the importance of standardisation for the domain industry. The RrSG recommends that Standards in the future should be required of RSPs in aspects such as Extensible Provisioning Protocol (EPP) extensions, file formats, billing transactions and Domain Transaction Type Name. This will ultimately reduce operational costs and consequently reduce end user fees.

Continuing the theme of standardisation, the RrSG would encourage ICANN to ensure in future rounds of nTLDs that there is a base Registry-Registrar-Agreement utilized by all registries. This would also reduce operational costs, for both registries and registrars and would create a fair and transparent contractual basis for new TLDs to be registered and managed.

The RrSG is yet to reach consensus on new rounds of nTLDs and is therefore refraining from commenting on the topic at this time. Members have been encouraged to comment individually if they so wish to do so.

There has been much discussion on the Base Registry Agreement and possible provisions within four different classifications of TLD types. The question is whether there should be separate Base Agreements for different TLD Types, or one Base Agreement, for which different TLD types may request exemptions for certain non-relevant contractual obligations. The RrSG does not wish to comment on the mechanics of how this should be contractually dealt with by ICANN. However, regardless of the mechanism ICANN chooses, the process must be 100% clear and defined within the Application Guidebook or equivalent. There should not be any new “on the fly” exemptions made or new TLD types classified, once the applicant window is closed.

Because the current questionnaire had over 100 questions to potentially comment on, the RrSG has chosen to only comment on a few questions that are pertinent to Registrars. However, for any comments the RrSG has not commented specifically on, though the RrSG may be generally satisfied with the way in which the other topics have been managed by the current nTLD Program, full support should not be assumed.