New gTLD Subsequent Procedures Policy Development Process Working Group

Role of Application Comment

TBD

Subsequent Procedures
July 30, 2018

ICANN

Role of Application Comment

- Background: Implementation Guideline C required that ICANN org provide the ability submit public comment (aka Application Comment).

- ICANN org provided an application comment forum for every application, opened when application published. Comments could be specific to evaluation elements (e.g., Initial and Extended Evaluation, CPE, objections to a limited degree).

- Application comment could be considered by evaluation panels. If comments may alter scoring, applicants consulted, and if final score affected, explanation included in scoring report.

- Application comment also utilized for application change requests.

Role of Application Comment

- Section in Program Implementation Review Report: Section 1.3, which includes a breakdown of comment per section.
    - Background screening, string similarity, registry services, and CPE all received 12% or higher of total comments.
    - As of 31 July 2015, total of 12,691 comments submitted.

Input From ICANN62

Question from ICANN62: **Do you think any changes are needed to the way the application comment process is conducted or used? Please explain.**

- ⊙ Discussion focused on the opportunity for the applicant to respond to comments. There was openness to receive comments, but some felt that there were frivolous complaints that couldn't be responded to in an open manner, or to correct them in real time. These comments also were considered by evaluators.
    - ○ Note, if comments might affect scoring, applicants were given opportunity to clarify.

- ⊙ Concerns around process and practicalities: With a high number of applications and comments received, are there better ways for the community to consider comments? Perhaps some kind of filtering mechanism?

Input From ICANN62

Question from ICANN62: **Do you think any changes are needed to the way the application comment process is conducted or used? Please explain.**

- ⊙ Some comments about the period of time allowed for public comment. Was the time period long enough? For comments related to Initial Evaluation, original period was 60 days from publication of applications (per section 1.1.2.3 of the AGB), though this was extended an additional 45 days.

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Questions for discussion:

1. While applicants could reply to application comment if they chose. However, they were informed if a comment may impact scoring and had the opportunity to provide clarification. Is this process sensible? Are improvements needed?

2. Since applications were per application, is there a more elegant way for the community to review comments submitted?

3. Was the time period to submit application comment for Initial Evaluation sufficient?

4. Was the way in which application comment was considered in each of the various evaluation areas appropriate?

5. Does it make sense to keep the application comment system continuously open, even after additional comments are not expected to impact evaluation elements?

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Questions for discussion:

6.	Is there any additional functionality needed for submitting application comment (noting that there was a character limit and comments were prevented from utilizing attachments)