Your name: Kathryn Kleiman [Bold below offered to show edits only]

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| **Issue** | **Applicable text (please quote directly)** | **Number and name of applicable report section** | **Cannot live with rationale** | **Proposed changes (taking into account whether others would be able to live with them)** |
|  | **c. New issues raised in deliberations since publication of the Initial Report, if applicable.**  While a number of responses to public comment supported preliminary recommendations that no application submission limits should be put in place, the Working Group also reviewed and discussed comments that favored placing limits on the number of applications. In particular, the Working Group considered a suggestion that ICANN should allow no more than 24 applications for each company, including its parent company, subsidiaries, and affiliates. The stated goals of this proposal were to increase fairness and allow for adequate oversight and public review. The Working Group did not find a clear rationale for the specific number proposed and did not come to any agreement to move forward with the proposal. | 2.2.5.c | **c. New issues raised in deliberations since publication of the Initial Report, if applicable.**  While a number of responses to public comment supported preliminary recommendations that no application submission limits should be put in place, the Working Group also reviewed and discussed **strong** comments that favored placing limits on the number of applications. In particular, the Working Group considered a suggestion that ICANN should allow no more than 24 applications for each company, including its parent company, subsidiaries, and affiliates. **The rationale provided for this dissenting view was that potentially unlimited application numbers favored large, existing entities, at odds with the overall goals of encouraging applications for gTLDs from companies and communities around the world. If hundreds, or thousands, of applications are allowed from large companies in developed countries, there will few gTLDs left for the Global South.**  The stated goals of this proposal were to increase fairness and allow for adequate oversight and public review. The Working Group did not find a ~~clear rationale~~ **feasible way to enforce a** ~~or the~~ specific number proposed and did not come to any agreement to move forward with the proposal. | The issue in our discussions wasn’t fairness(I think there was a strong view that allowing a few large players to dominate isn’t fair), but feasibility. How would we enforce limits? How could they be detected if subsidiaries were created?  Certainly this issue of ownership has been reviewed and incorporated by other groups – foreign ownership restrictions, for example, on US broadcast stations by the FCC. But it was not something this group found feasible at this time. |
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