Your name: Rubens Kuhl

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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)** |
|  | Affirmation with modification xx: If the volume of applications received exceeds 500, applications will be processed in batches of 500. In the 2012 round, the Section 1.1.2.5 of the Applicant Guidebook provided that the first batch would consist of 500 applications, but each subsequent batch was to be only 400 applications. For ease, the Working Group has modified this to an even 500 applications per batch. | 2.6.1**a. Recommendations and/or implementation guidelines** | The actual 2012 implementation used no batching whatsoever, and I don’t saw a consensus to change that to implement batching. It also contradicts evaluation efficiencies. | . In the 2012 round, the Section 1.1.2.5 of the Applicant Guidebook provided that the first batch would consist of 500 applications, but each subsequent batch was to be only 400 applications. Nevertheless, the actual 2012 implementation had no batching at all. The workgrup affirms the 2012 implementation, so it also prescribes changing the Applicant Guidebook to reflect it.  |
|  | Recommendation xx: For subsequent rounds, the Working Group recommends that the following formula must be used with respect to giving priority to Internationalized Domain Name applications:* First batch of 500
 | 2.6.1**a. Recommendations and/or implementation guidelines** | If batches are removed, the language needs to be adopted. The listed method can be kept so the IDN priorities can be fitted in the overall randomization. Removing batches requires no change to this except language.  | Change all instances of the word “batch” with the word “group”, ending up with the same effect in providing IDN applications some priority.  |
|  | Implementation Guidance xx: Procedures related to application queuing should be simplified and streamlined to the extent possible. For example, applicants could be provided the opportunity to pay the optional fee for participating in the drawing along with payment for the application. Another suggestion is to explore ways to assign a prioritization number during the application process without the need for a distinctly separate drawing event. | 2.6.1**a. Recommendations and/or implementation guidelines** | It’s unclear whether this is optional to applicants or to ICANN. If ICANN can establish a draw without a separate fee, then this option must be exercised.  | Implementation Guidance xx: Procedures related to application queuing should be simplified and streamlined to the extent possible. For example, applicants could be provided the opportunity to pay the optional fee for participating in the drawing along with payment for the application. If the fee is not required to establish a legal basis for the randomization, then a fee must not be required, only an indication of wanting prioritization or not. Another suggestion is to explore ways to assign a prioritization number during the application process without the need for a distinctly separate drawing event. |
|  |  | 2.6.1**b. Deliberations and rationale for recommendations and/or implementation guidelines** | Same issue with batches as #2 |  |
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