Comments from Combell Group NV/SA
Applicant for the .GENT TLD (geographic TLD)

Introduction

Geographical Name gTLDs have Governmental Support

Geographical Names as gTLDs are clearly defined by the gTLD Applicant Guidebook, paragraph 2.2.1.4.2 Geographic Names Requiring Government Support. Geographical Name gTLDs (Geo-TLDs in the following) have in common that the string is a meaningful representation or abbreviation of a geographical name that is protected by national laws. Geo-TLDs have also in common that the respective operator for the string is or is being supported by the relevant sovereign local and national government(s). By these least common denominators the Geo-TLDs are in the Public Interest.

66 Applicants claimed the "Geographical Name" status

As of 13 June 2012 66 applications that claimed the Geographical Name Top-Level Domains status have been published. The Geo-TLD applications range from TLDs for large cities and regions to small cultural and language TLDs. The applicants and respective gTLD operators range from governments to non-for-profit entities and commercial companies. The business models range from a single registrant regime (only for use by the government) via restricted registrations (only for individuals of the community) to free domain name registrations for everyone.

Geo-TLDs have already expressed their opinion to ICANN

At least a dozen City and Regional Governments have written to ICANN during the last months to support a preferred processing of Geo-TLDs but ICANN neither published these letters nor gave a feedback.

In order to follow ICANN's request to answer specific questions on processing applications we would like to comment as follows:

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Should the metering or smoothing consider releasing evaluation results, and transitioning applications into the contract execution and pre-delegation testing phases, at different times?

In order to facilitate a smooth implementation of new gTLDs into the root, uncontested applications that have been successfully evaluated should immediately be directed to "Transition to Delegation" including publication of the evaluation results for the publicly available part of the applications. A simultaneous release of evaluation results of all applications is unnecessary and contra productive since it creates further delays for applicants.

How can applications be allocated to particular release times in a fair and equitable way?

A fair and equitable way would be to delegate applications in an order that serves the public interest. Such an order should prioritize uncontested applications that have a special public interest status such as a) Geographical Name, b) Community or c) IDN. The sequencing for delegation should follow a round-robin process per ICANN region.

As a second step an ICANN region based round-robin should be conducted with uncontested applications from single applicants and portfolio applicants who can choose one string as their preferred one, assuming this string has neither objections nor contention.

The round-robin will be continued as long as necessary. Applications in extended evaluation, objection, contention and with GAC interaction will be added to the round-robin pool as soon as their objection and/or contention has been completed.

Would this approach provide sufficient smoothing of the delegation rate?

Our described approach would not only serve the public interest and take the interests of all applicants into respect, it would also allow creating new gTLD success stories for ICANN. Such events are desperately needed to reinforce public interest, trust and reliability in ICANN and are according to ICANN's mission.

Should the metering or smoothing be accomplished by downstream metering of application processing (i.e., in the contract execution, pre-delegation testing or delegation phases)?

With the proposed public interest priorization and followed by a round-robin method we do not expect any necessity to downstream delegation rates.

Additionally all applicants should be asked if they want to "opt out" with the consequence of being initially evaluated at a later stage. This could significantly decrease the number of applications to be reviewed in the first instance.

How can applications be allocated to a particular timing in contract execution, pre-delegation testing, or delegation in a fair and equitable way?

ICANN should forward applications in the "transition to delegation" status as soon as possible after they have been reviewed successfully in order to facilitate a smooth introduction of new TLDs into the root.

Provide reasoning for selecting this approach.

The questions should be asked the other way around. Are there any valid reasons why the publication of evaluation results should be withheld to a certain "reveal date"? Therefore ICANN should process gTLDs down the path as they are ready for the next step.

Include a statement describing the level of importance that the order of evaluation and delegation has for your application.

Geo-TLDs are very well accepted and popular new gTLD strings, this is common opinion within the ICANN community including GAC. In terms of business planning an early approval of Geo-TLDs is likely to contribute to a maximum economic and political success of the New gTLD program and ICANN's reputation as well.