The New TLD Applicant Group (NTAG), an Interest Group of the Registry Stakeholder Group, welcomes the opportunity to submit comments to ICANN relative to multiple topics concerning the timeline, processes, and launch of New gTLDs. The comments below represent the consensus of NTAG and are intended to provide ICANN with constructive ideas geared toward an efficient progression toward the ultimate launch of New gTLDs into the marketplace. As you can see from the comments below, an overall theme that NTAG agrees on is that it is important for ICANN to continue to move the New gTLD process forward and avoid any additional delays. It is important to note that we are offering suggestions that work within the established framework of the Applicant Guidebook (AGB) to ensure timely, equitable, and consistent next steps. We would welcome the opportunity to meet with ICANN to discuss these concepts further. Thank you for the opportunity to provide this input.

1.   Initial Evaluation -- Initial Evaluation for all strings should be completed as soon as possible. Based on efficiencies we pointed out in our last letter and ICANN's estimates of 300 per month, Initial Evaluation for all strings should be completed by January 2013. If there are particular areas of concern in the evaluation process (such as the letters of credit) that may require responses from applicants or additional time, ICANN should attempt to frontload this work so that it does not subsequently block the evaluation process. Notwithstanding ICANN's statements to the contrary, there is **not** a consensus within the group that initial evaluation results should be held back until all evaluations are complete; in fact, many applicants believe that initial evaluation results should be released as they become available.

2.   Metering/Sequencing -- NTAG recognizes that there needs to be some form of metering/sequencing at some point in the process. In light of this need, ICANN should establish a sequencing method as soon as is reasonably possible. NTAG does not have consensus yet on a replacement for Digital Archery to determine sequencing. As such, we would welcome the opportunity to provide additional information on applicant views/preferences as well as receive information related to technical and administrative thresholds that may exist.

3.   String Similarity/Contention Sets -- In order to give applicants clarity and more certainty, as well as to facilitate contention set resolution, ICANN should announce string similarity results at least two weeks prior to the Toronto meeting. ICANN estimated on its recent webinar that it would announce results in late October/early November. We believe it should be possible to complete this review in a more timely manner, and that a release prior to Toronto would greatly enhance the probability of success of ICANN's stated goal of having applicants resolve contention sets amongst themselves by allowing applicants a venue to begin those discussions in person. In addition and for similar reasons, ICANN should announce any application withdrawals no more than one week after they are received.

4.   Objection Period -- We agree with ICANN staff that the Objection Period should be no longer than seven months from the Reveal Date.

5.   GAC Process

A.   Early Warnings -- We agree with ICANN's decision to grant the GAC's request to extend Early Warnings from August 12 to October 19 to accommodate the GAC face-to-face meeting in Toronto.

B.   GAC Inter-sessional -- NTAG recommends that ICANN and the GAC consider the benefits of holding an inter-sessional dialogue during the six-month gap between the ICANN Toronto and Beijing meetings in order for GAC members to deliberate on the issuing of formal advice to ICANN related to specific applications. We recall that such an inter-sessional meeting was an effective means of addressing issues relating to the AGB prior to the ICANN Singapore meeting, and that the issuing of advice may be sufficiently complex to warrant in-person dialogue.

C.   GAC Advice -- In order to maintain the important timelines of the program, NTAG recommends that the Board suggest that the GAC provide advice to the Board on individual strings shortly after the inter-sessional meeting. Under the ICANN Bylaws, the GAC could provide advice at any time and the Board would consider such advice. If the GAC wanted to avail itself of the enhanced presumption in the AGB (GAC advice against an application creates a "strong presumption" that Board will reject such an application), however, it should follow the timeline in the AGB and offer its advice by the close of the Objection Period. Otherwise, its advice should carry the same weight it would under the Bylaws.

6.   Pre-Delegation Testing -- We recommend that ICANN begin pre-delegation testing as soon as practicable and not wait until Initial Evaluation is concluded.

7.   Contracts -- We recommend that ICANN begin the contracting process as soon as practicable--contracts could be sent out and negotiated when applicable, but not signed until later in the process.

8.   Root Scaling -- We recommend that ICANN liaise with appropriate experts, including the Security and Stability Advisory Committee (SSAC) and the Root Server System Advisory Committee (RSSAC), to revisit 1,000 limit on root insertion. The limit was suggested years ago and may be based on information that no longer is current.

9.   Transparency -- We recommend that ICANN continue to strive to improve communication with applicants. For example, many applicants would welcome a regularly updated scorecard or dashboard that includes progress metrics such as the status of initial evaluation reviews, background checks, string similarity review, number and name of withdrawn applications, etc.

We welcome any comments or thoughts on any of the recommendations provided above.

NTAG Level of Support

1. **Level of Support of Active Members**: [Majority/Supermajority]

   1.1. # of Voting Members in Favor: XX

   1.2. # of Voting Members Opposed: XX

   1.3. # of Voting Members that Abstained: XX

   1.4. # of Voting Members that did not vote: XX

   1.5. # of Non-Voting Members in support: XX

   1.6. # of Non-Voting Members in opposition: XX

2. **Minority Position**(s):