



ICANN Board new gTLD Programme Committee  
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Dear Committee Members

Nominet UK has been following with interest the discussion within the ICANN community on the 'digital archery' process for batching new gTLD applications. We would like to bring to the Committee's attention a specific problem which would result from the current approach being followed unless some modification to the process is made.

Nominet has submitted two separate gTLD bids for the geo-names Dot Cymru and Dot Wales, with the support of both the Welsh Government and the UK Government. Although the gTLD process has required us to submit these as two separate bids, in reality they form a single, indivisible whole. There is one business plan, with combined operations, technical processes and policy development, the aim being to provide a unique domain space for Wales. Wales is a bilingual country, where all political parties share a goal of promoting the use of the Welsh language online. It has been made very clear to us that the public and political expectation is that both Dot Cymru and Dot Wales will move forward together at the same time, so that the interests of all stakeholders in Wales are served. It would be particularly unacceptable to stakeholders in Wales if Dot Cymru were delegated some two years after Dot Wales or vice versa.

We are very worried indeed that the batching methodology and digital archery processes do not seem to allow for the linking of applications in any shape or form. There seems to us to be a real risk that Cymru and Wales will find themselves allocated to separate batches, and therefore subjected to separate assessments by different assessors on different timescales. There may be other bids, whether for IDNs or representing other dual language communities, which will raise similar problems. The only way in which this could be addressed by us would be to elect for both applications to be considered in whichever was the later of the two batches to which Dot Cymru and Dot Wales are assigned. Even then there would be a risk that one set of assessors would take materially longer than the other, particularly if they decided that the application required extended evaluation for some reason.

We note that many prominent voices in the community are now asking for the Board to reconsider the batching methodology. We would like to add our voice to these requests. We believe that now the nature and spread of applications is known, it may be possible to devise a solution which removes the need for batching altogether. If this does not prove possible we believe the batching methodology should be adapted to ensure that applications with the geographic/linguistic features that our Dot Wales/Dot Cymru applications have should receive priority, and should not be split between different batches.

Yours sincerely

Lesley Cowley OBE  
Chief Executive