

**01 June 2012**

Dr. Steven D. Crocker, Chairman, ICANN Board of Directors  
Mr. Rod Beckstrom, ICANN President and CEO  
ICANN Board New gTLD Program Committee

Via email

Dear Dr. Crocker,

**Re: New gTLD Program – Digital Archery and Batching Processes**

ARI Registry Services is supporting 161 applications and over 100 individual applicants for new gTLDs. As we approach the next phase of the application process, ARI Registry Services would like to provide comment and insight into this phase; in particular we would like to comment on the “batching” process that is currently being finalised.

Batching was initially proposed to deal with an unknown and potentially large number of applications. Had the early assumption that tens of thousands of applications would be received actually resulted, this would have posed a massive strain on ICANN’s operational resources. Batching was then seen as an obvious method for allocation of those scarce resources. Now that the application window has closed and actual data is available, ICANN is in the position to review this early assumption and determine if batching is required. Alternative processes may provide greater transparency and also alleviate the issues that are apparent in the suggested “digital archery”.

There may be concerns over root scaling if the entire 1,900 applications are reviewed at once. There are, however, a number of gateways that will inherently moderate the process for different applications. These include: extended evaluation, contention sets, contract negotiation, and pre-delegation testing. In addition, an applicant’s own personal timeline for go-live will have an impact.

It is the opinion of ARI Registry Services that the batching process, at least for evaluation, may not be required. A deeper review by ICANN will reveal operational efficiencies that allow for a single, all-encompassing process that does not impact the overall timeline. We believe that the best course of action is for ICANN to solicit the input of the community at the upcoming ICANN Prague meeting, perform the necessary due diligence on the data now available, and then make a decision on a way forward.

The ultimate goal of this recommendation is to provide all applicants with a level playing field from which to launch a new gTLD.

These recommendations support the letter sent on 30 May 2012 to the ICANN Board entitled '*Regarding "Digital Archery" batching method*' by Theo Hnarakis, Chief Executive Officer and Managing Director of Melbourne IT.

To reiterate, we urge you to consider this position and undertake the following:

- A reconsideration of the proposed batching timeline, currently due to commence on 8 June 2012; and
- An investigation into alternatives presented by the community during the ICANN Prague meeting.

These recommendations are based on ICANN having the budget and the data to consider this approach without impacting the overall timeline.

Yours sincerely,



**Adrian Kinderis**  
Chief Executive Officer  
ARI Registry Services