Dear ICANN Board,

China Organizational Name Administration Center (CONAC) would like to express an attitude towards the batching issue.

Firstly, it is not a wise move to jump into the decision for one single Batch hastily, since nobody is sure that the new "solution" is better or even appropriate.

Secondly, changing the Batching strategy increases costs for all applicants significantly. Applicants, including Chinese IDN new comers, have already invested huge amounts of time, energy, money, and patience in the new gTLD program, and many of them had done the digital archery.

Thirdly, applicants that had obeyed ICANN board's decisions will feel cheated and will question Board's credibility. Changes would surely compromise the confidence that the community has gradually built in ICANN.

We consider that batching is not perfect, but a solid solution, it needs revision, not abolition. We still remember that TAS had also encountered system failure, and it's ICANN's insistence that finally solved the problem.

We also anticipate that a single batch could also bring some hidden risks that may harm the whole project. We believe that the objective of ICANN to expand the gTLD naming space is for encouraging innovation and increasing competitiveness, which should be implemented fairly. However, a single batch may also cause the unexpected issues.

In such a complicated project, new applicants from non-English speaking countries and regions may encounter many unexpected obstacles. Each of the obstacles could be sufficient to postpone their whole business plan. We reiterate that ICANN should consider the diversity of geography as well as language and put forward prior policies for IDN gTLDs to protect the rights and benefits of applicants, take priority upon IDN gTLD applications in the first round.

To summarize, without reaching a consensus from the community, it is very inappropriate for ICANN to change the batching policy which has already been executed, otherwise, it will be followed by more costs and chaos. We urge ICANN to maintain consistency in the resolutions made. We respected the resolutions made about batching in Costa Rica, and we will respect and support the resolutions made in Prague by the ICANN board.