



Aug. 17, 2012

Subject: CONAC's Comment on Batching/Metering Issue

Dear ICANN Staff,

In response to ICANN new questions on batching on July 29, China Organizational Name Administration Center (CONAC) would like to add the following comments in addition to comments made on June 27 and July 13. Please refer to attachment 1 and attachment 2 for previous comments.

It seems obvious that metering or smoothing is inevitable. It was agreed that ICANN would not delegate TLDs at a rate greater than 1,000 per year. But it is very likely that more than 1000 strings among 1927 applications will pass the evaluation in the same year, even though there may be natural slowdown due to objections and contentions. Thus, downstream metering of the application processing is necessary. In this sense, it is impossible to achieve absolute fairness and equitability.

To be relatively equitable, CONAC proposes the following approaches echoing what are mentioned in the previous letters.

First, the applicants who have participated secondary timestamp (or the digital archery) project, should be given priority.

CONAC noticed that ICANN mentioned the new gTLD batching process in section 1.1.2.5 of Applicant Guidebook: "If the volume of applications received significantly exceeds 500, applications will be processed in

batches and the 5-month timeline will not be met.....If batching is required, a secondary time-stamp process will be employed to establish the batches.....”

On March 28, 2012, ICANN introduced digital archery and till June 23, 20% of the applicants have already registered their timestamps. But the policy was cancelled after ICANN Prague Meeting.

While ICANN canceled the secondary timestamp policy, we appeal ICANN to take consideration of the interest of those applicants who keenly follow ICANN’s rule and policies in respect to digital archery. We strongly believe that the interest of those who have already practiced digital archery should be protected by prioritizing their application in evaluation or contract execution.

These applicants highly trust ICANN, which motivate them to actively respond to ICANN policies. If ICANN impair their interest, their trust to ICANN may be affected. At the same time, while the applicants follow the batching policy, they pay high cost by investing in human and financial resources. If they are compensated, it will be unfair to them.

Secondly, IDN applications, especially those from developing countries and regions shall be prioritized.

The delegation process shall comply with the goals of New gTLD program. According to the introduction of new gTLD program in ICANN website, “The program's goals include enhancing competition and consumer choice, and enabling the benefits of innovation via the introduction of new gTLDs, including both new ASCII and internationalized domain name (IDN) top-level domains.”

CONAC believes that the introduction of new gTLD batching process should be highly consistent with the goals of promoting competition and consumer choice, and enabling the benefits of innovation via the

introduction of new gTLDs. It has been proved that the introduction of IDNs is a big innovation and success of the Internet. For instance, according to the 30th Statistical Reports on the Internet Development in China (released by CNNIC in July 2012), the registration number of “.中国” TLD reached 311,399, which is ranked as No.4 in the Chinese TLD Market. Chinese IDN is gaining more popularity among Chinese Internet users.

Finally, CONAC would like to express our gratitude to ICANN for providing an opportunity to comment on this issue, as well as ICANN’ s continuous effort to move the new gTLD program forward. CONAC values ICANN’s bottom-up policy making process, and wish ICANN take serious consideration of our suggestions.

Best Regards,



Qing Song

CEO

China Organizational Name Administration Center

➤ **About CONAC**

China Organizational Name Administration Center (CONAC) is a non-profit organization affiliated to China State Commission Office for Public Sector Reform (SCOPSR). SCOPSR is an executive organ of the State Commission for Public Sector Reform, which is led by the Premier of the State Council.

CONAC, as a stakeholder of ICANN community has participated in ICANN meeting for 4 year, and has sponsored ICANN meeting for 4 times, 2 times as silver sponsor and 2 times as golden sponsor. Right now,

CONAC is participating in ICANN new gTLD program to apply for two Chinese TLDs “.政务” (government and government affairs) and “.公益” (public interest).

The mission of CONAC is to promote and regulate the development of E-government and online public interest undertakings, and protect the interests of government organizations and public interest organizations. Approved as one of the two registries in China by Ministry of Industry and Information Technology (MIIT), the Chinese Internet industry regulator, CONAC has been operating “.政务.cn” and “.公益.cn” since July15, 2008.