Review of the Draft Registry Service Provider (RSP) Handbook - New gTLD Program

Comment of the ICANN Business Constituency (BC)

22-Apr-2024

General Comment

The Business Constituency (BC) acknowledges the importance of the Registry Service Provider (RSP) Evaluation Handbook in ensuring the ability, integrity and efficiency of domain name registries. As stakeholders deeply invested in the stability and effectiveness of the Internet's unique identifier systems, we offer the following comments to enhance the evaluation process:

Question 2: Comments on Clarity of requirements for RSP applicants
In reviewing the eligibility criteria outlined in Section 3.1 of the Handbook, we appreciate the detailed explanation provided regarding the types of entities eligible to apply as RSPs.

The BC's recommendations include simplifying the language in eligibility criteria to make it easily understandable for all applicants, providing clear instructions on required documentation, and ensuring transparency in the background screening process. These measures aim to minimize confusion, facilitate compliance, and instill confidence in the application process for prospective applicants.

Question 2: Comment on Additional topics of inquiry for RSP applicants
In addition to existing evaluation criteria, the BC suggests exploring additional topics of inquiry for RSP applicants to enhance the comprehensiveness of evaluations. These may include considerations related to cybersecurity measures, and disaster recovery plans. By expanding the scope of inquiry, the evaluation program can ensure that selected RSPs possess the requisite capabilities to address evolving challenges and priorities.

Question 3: Comments on Timeliness of evaluations with respect to RSP selection by gTLD applicants
We commend the delineation of evaluation periods for RSPs, as described in sections 2.1 and 2.2 of the document. The establishment of a pre-evaluation period allows RSPs to undergo assessment well in advance of the application submission period for new gTLDs. This provides ample time for preparation and ensures that RSPs are adequately evaluated before the application phase begins. Moreover, RSPs should be given a specific time to cure problems identified in pre-evaluations.

While the proposed timelines for the pre-evaluation period are reasonable, we urge ICANN org to ensure that the evaluation process adheres to these timelines rigorously. Timeliness is crucial to support business planning and decision-making for both RSPs and gTLD applicants. Therefore, we recommend that ICANN org implements mechanisms to monitor and expedite the evaluation process, if necessary, to prevent delays and ensure that evaluations are concluded within the stipulated time frame.

Additionally, we encourage ICANN org to provide clear communication regarding the expected timelines for each stage of the evaluation process. This will enable RSPs and gTLD applicants to plan their activities accordingly and mitigate uncertainties surrounding the evaluation timeline.

Question 10: Comment on Clarity of questions being asked of RSP applicants
The BC underscores the importance of formulating questions to RSP applicants in a manner that promotes business development. Questions should be framed in a way that elicits meaningful responses pertaining to technical capabilities, operational efficiency, customer service provisions, and strategic alignment with the goals of gTLD applicants. Clear and relevant questions enable applicants to articulate their value propositions effectively, facilitating informed decision-making by gTLD applicants.

Other Comments: RSP Evaluation Fee
The BC requests ICANN to release the actual sum of RSP Evaluation fees as early as possible. The fees will be a key consideration factor for new RSPs, especially from underrepresented regions, to participate in the program and expand the pool of qualified RSPs. This is important because the current spread of existing RSPs is negligible in the global south.

BC also requests ICANN to accept payments via Credit Cards, in addition to wire transfer. In many countries, international wire transfers are a lengthy and cumbersome process. Accepting credit card payments would make it easier for new RSPs to apply.

Other Comments: helping new RSPs
In addition, ICANN should work to help new RSPs earn qualification. That would create more competition for RSPs from the 2012 TLD expansion round who are seeking re-qualification for the present round.

Conclusion:
We believe that addressing the criteria of timeliness, clarity of requirements, exploration of additional topics, and clarity of questions will contribute to the effectiveness and integrity of the evaluation process.   We remain committed to collaborating with stakeholders to enhance the domain name ecosystem and support the continued growth and innovation of the Internet.

This comment was drafted by Segunfunmi Olajide, John Berard, Alan Woods, and Vivek Goyal.   It was approved in accord with our charter.