The Internet Service Providers & Connectivity Providers Constituency welcomes this opportunity of commenting on the Draft Framework for Closed Generic gTLDs.

The ISPCP Constituency commends the participants of the GNSO, the GAC and the ALAC in the Dialogue for producing a balanced approach of the various views expressed in the community on this topic. The Constituency agrees that it should be the basis for future policy work to develop a consensus policy for closed generic gTLDs, and in this respect should constitute the first step towards answering the Board's request and the associated framing paper on the issue.

Regarding the overarching principles developed in the framework, the ISPCP supports the notion that a closed generic gTLD should serve both the global public interest and *a* public interest of a single community. The ISPCP also endorses the principle of consistency with the processes of application, evaluation and delegation developed by the SubPro WG.

For the next steps and given the complexity of the topic and the variety of potential use cases, the ISPCP would encourage the scoping effort to further enhance the predictability of the application process, be it through a scoring system or other means. Whilst it may be unreasonable to expect that the application process be straightforward and easily automated, it would be equally unacceptable for two similar applications to lead to different results as it may put ICANN's liability and credibility at risk.

The ISPCP notes that the contractual commitment to "non anti-competitive behavior" subject to the alternative track of a closed generic gTLD application may be challenging to enforce once the TLD is delegated and the Constituency would encourage the policy work to further develop enforcement principles as they relate to this particular commitment. More generally, the Constituency concurs with the group that the notion of enforceability is central to a public interest goal of a closed generic TLD being met over time. Although it was beyond the mandate of the Dialogue (and possibly the mandate of the policy effort to come next), the ISPCP considers this topic to be critical, and a prerequisite for the policy to be developed to be viable, and recommends that a dedicated study be conducted on this topic in parallel to the policy effort rather than deferring the analysis to implementation.

 The Constituency, however, applauds the systematic and detailed process of evaluation, showcasing a transparent and structured mode of application process.

The ISPCP finally notes that evaluating the genericity of a term in non-English languages (IDN or not) may be challenging for an evaluation process that is likely to rely heavily on evaluation panels. Noting that around 50% of websites use non-English languages, the process must ensure that all languages can be treated equally.

The ISPCP again thanks the members of the Dialogue for their work, supports the framework as it has been developed and is looking forward to the next steps on this topic.