



George Town, June 1st, 2021

ICANN
Board of Directors
12025 E. Waterfront Drive
Los Angeles, CA 90094-2536

RE: Input on the GNSO New gTLD Subsequent Procedures Final Outputs for ICANN Board Consideration

Uni Naming & Registry (UNR) appreciates the work done by the GNSO New gTLD Subsequent Procedures PDP Working Group in producing consensus outputs in its Final Report. UNR supports most of the recommendations, implementation guidance and affirmations included in the Final Report. UNR has been a gTLD Registry Operator since the 2012 new gTLD round and has recently shifted its focus to growing its registry services division and IP rights protection technology, which already supports numerous third-party gTLDs and ccTLDs.

In this context, UNR is providing the following input:

Under Topic 6: Registry Service Provider (RSP) Pre-Evaluation, recommendation 6.9 states the following: “A list of pre-evaluated RSPs must be published on ICANN’s website with all of the other new gTLD materials and must be available to be used by potential applicants with an adequate amount of time to determine if they wish to apply for a gTLD using a pre-evaluated RSP”.

UNR fully supports this recommendation, however, we ask that the ICANN Board (and ICANN Org) take into account that not all potential applicants will be on the same footing in terms of preparedness to apply for new gTLD strings. It is very likely that newcomers will need a lot more time to prepare and be ready, putting them at a significant disadvantage over incumbent Registries.

To mitigate the issue, UNR advises the ICANN Board and ICANN Org not to delay initiating the Registry Service Provider Pre-Evaluation process. This should be done by prioritizing the implementation of this process as well as launching a Communications Period as early as operationally feasible. Technical requirements to act as a Registry have been honed and applied for more than 30 years: they are unlikely to change dramatically as we get closer to the application submission period. It would therefore be possible to initiate the Pre-Evaluation Process while other issues are still being addressed.

Allowing more time for brand owners and applicants from underrepresented regions to find a suitable technical provider – when these requirements are and will remain for some time the clearest in the whole process – would help them concentrate on the other parts of their applications. This approach would help more applicants see their applications proceed to the contracting and delegation phases, and would enhance the predictability of the entire process from application to delegation, which was determined to be desirable as per recommendation 7.3 of the Final Report.

UNR believes this advice is consistent with the spirit and intent of the Working Group’s outputs and final report and reinforces the implementation guidance provided by the Working Group. We are looking forward to continuing to work with the Community and ICANN Org to provide predictability and stability to future applicants.

Respectfully submitted,



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