

29 April 2019

The Registrar Stakeholder Group's Response to the Proposed Renewals of the .ORG, .INFO and .BIZ Registry Agreements

The Registrar Stakeholder Group (RrSG) appreciates the opportunity to comment on the Proposed Renewal of the .ORG Registry Agreement, the Proposed Renewal of the .INFO Registry Agreement, and the Proposed Renewal of the .BIZ Registry Agreement.

In theory, a healthy domain name marketplace dictates appropriate pricing based on competition and end-user demand. However, the TLD marketplace is unique in its structure with things like presumptive-renewal and price caps. Fundamentally, our belief is that ICANN is required to be both careful and rigorous in its management of this market and competition within it. We believe that any changes to the current balance should not be made without thorough study. While the new gTLD registries are facing a significantly new world of competition, that is not true for most legacy gTLDs and it is certainly not true for .ORG, .INFO, and .BIZ.

Although not restricted in their uses, these three gTLDs have been and continue to be uniquely positioned to service specific markets: non-profit organizations with .ORG, information websites with .INFO, and businesses with .BIZ. From an end user's perspective, similar to Verisign's .COM and .NET, these three gTLDs do not have true competitors to influence reasonable pricing within the market. In the end, unrestricted price increases will negatively affect these registrants – they have to pay the increased fees.

The RrSG is concerned that ICANN has arbitrarily chosen to remove pricing restrictions that could negatively impact current and future registrants of .ORG, .BIZ, and/or .INFO domain names where there is no reasonable competition to influence reasonable pricing and without engaging in appropriate market analysis.

Before agreeing to remove any pricing restrictions for .ORG, .INFO and .BIZ, or other legacy gTLDs like .COM, the RrSG requests that ICANN conduct an economic study of whether competition can effectively constrain prices. Performing such a study is consistent with ICANN's obligations under its Bylaws and is consistent with the September 2018 recommendations of the Competition, Consumer Choice, and Consumer Trust Review Team (CCT-RT). As the burden for such an increase falls on the registrant, we believe it is incumbent on ICANN to ensure that any decisions made are

based on relevant data and that any price increases have been duly considered with the entire community's best interests in mind.

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