

May 2, 2019

Internet Corporation for Assigned Names & Numbers (ICANN)
12025 Waterfront Drive, Suite 300
Los Angeles, California
90094-2536, USA

Attention: Mr. Russ Weinstein, Global Domains Division

*Re: Statement of the Not-for-Profit Operational Concerns (NPOC) Constituency on the
Proposed Renewal of .ORG Registry Agreement*

The Not for Profit Operational Concerns Constituency is writing to oppose the Section 2.10 removal of price cap provisions in the .org Registry Agreement. Please note that NPOC otherwise strongly supports the concerns outlined by the Non-Commercial Stakeholder Group in their separate submission concerning the decision to subject the renewal agreement to Rights Protection Mechanisms.

The Not for Profit Operational Concerns (NPOC) Constituency represents over 95 member organizations within the ICANN ecosystem, to apprise them of policies and policy development process that could affect their ability to implement and achieve their mission.

NPOC is a Constituency of the Non-Commercial Stakeholders Group (NCSG), under the Generic Name Supporting Organization (GNSO) as specified by the ICANN Bylaws. Operational Concerns are defined as issues arising from the use of the gTLDs by the not-for-profit organizations to achieve their own mission. Those include: Domain Name Fraud, Intellectual Property Abuse, Privacy, Security, Stability and Resiliency, as well as transparent registration and continued ownership of domain names. These are accomplished through engagement activities in the development of DNS policies in cooperation with the wider internet community.

We understand that the .org renewal agreement is based on the [base generic top level domain \(gTLD\) Registry Agreement](#) updated on 31 July 2017, which stipulates the specific nature of the .org TLD, and relevant provisions in the [current .org agreement](#) have been carried over to the .org renewal agreement.

Overview of the NPOC concerns regarding .org price increases:

The removal of the price caps could create a situation where not-for-profit organizations, may be forced to choose between paying a higher price for a domain name, or providing the services they were formed to execute. Thus, NPOC concerns are as follows:

1. **Organizational Hardship:** The .org TLD is most often used by Not for Profit organisations or individuals involved with activities such as advocacy, humanitarianism and other public interest topics and are not necessarily making revenues. Many not for profit organizations struggle with funding to implement their activities, and unnecessary expenses can inflict financial hardship, especially for smaller organizations.

A good example, US\$50.00 goes a long way and can be the equivalent to the cost of food, building materials or a monthly salary. Needless to say, US\$50.00 can make a lot of difference if translated into medicine, clothes, or clean water. Spending this amount on a simple .org registration seems careless and many times, falling into bad decision making.

The .org renewal agreement intends to match the fee provisions stated on the based agreement, resulting in a potential increase of fees for new registrants, leaving current registrants to take precious time to strategize on price increase instead of implementing their activities. This is the antithesis of what not for profit organizations do.

2. **Restricting Access:** The ICANN motto ‘One World, One Internet’ would become obsolete as the removal of the price cap present greater obstacles for Not for Profits and other related initiatives to access the web platform, which greatly impede on those less fortunate and are least able to pay.

This may send the community message that ICANN is only interested in those who are able to afford this increased cost, which restricts many organizations in the global village, not ‘One World’ and if they can’t afford it, not ICANN’s problem.

For smaller organizations with less resources, the costs deter them from devoting funds to other important activities. The increase cost also highlights ICANN’s lack of foresight and understanding of the not for profit sector. The organizations with less resources are those on the ground trying to help the 10% of the world’s population living in dire poverty, earning less than \$2.00 per day. The price increase would deny access to the Internet, where organizations can market and promote their causes to solicit help from funders.

Smaller organizations are left with the painful decision of whether to divert funds for their activities or pay for a domain name. One option is simply to redesign another Internet strategy, possibly by using Social Media platforms, which will, in the long term reduce the revenue streams for ICANN Org.

3 **Impedes Freedom of speech:** As a fundamental activity of many not for profit organization, an Internet presence ensures, perhaps even guarantee a path to inform others of the issues affecting their communities. The Internet plays a crucial role in getting support for causes, if you are able to pay for it.

With so much crackdown on freedoms everywhere, the Internet plays a key role in making us equal as one world. It connects us. A price increase can lead to desolation and isolation if organizations cannot communicate their messages through their domain names.

Recommendations

1. We recommend that the price cap provisions in the current .org agreement (and the

.info agreement) are not removed; and

2. Proposed Renewal of .info Registry Agreement: Similar to what could happen if the .org renewal registry agreement is approved without changes, the .info TLD will affect to new registrants trying to provide information online by using the one TLD that is set up for those purposes, and which contains the intention explicitly at a string level. The .info TLD is basically used for those interested in providing important information to their community, many times, public interest information. We believe the .info TLD should, as well as the .org, maintain a fee cap for new registrants, specially because the gTLD's market has increased significantly and it is unlikely that no one, but those trying to put out information to the public (probably not with the intention of seeking profits) will choose a .info TLD so the argument being used to push the Section 6.1 forward on the .info renewal agreement should be consider flawed.