

GAC Advice Response Form for Applicants



The Governmental Advisory Committee (GAC) has issued advice to the ICANN Board of Directors regarding New gTLD applications. Please see Section II of the [GAC Buenos Aires Communiqué](#) for the full list of advice on individual strings, categories of strings, and strings that may warrant further GAC consideration.

Respondents should use this form to ensure their responses are appropriately tracked and routed to the ICANN Board for their consideration. Complete this form and submit it as an attachment to the ICANN Customer Service Center via your [CSC Portal](#) with the Subject, “[Application ID] Response to Buenos Aires GAC Advice” (for example “1-111-11111 Response to Buenos Aires GAC Advice”). All GAC Advice Responses to the GAC Buenos Aires Communiqué must be received no later than 23:59:59 UTC on 06-January-2014.

Respondent:

| | |
|--------------------------|------------------------|
| Applicant Name | United TLD Holdco Ltd. |
| Application ID | 1-1255-39674 |
| Applied for TLD (string) | GIVES |

Response:

United TLD Holdco Ltd. (“United TLD”), a registry operator and applicant for new generic top level domain names (gTLDs) wishes to thank ICANN for the opportunity to comment on the communiqué issued by the Government Advisory Committee (GAC) from Buenos Aires, Argentina on November 20, 2013 (the “GAC Communiqué”). United TLD would like to make two comments with respect to Section II of the GAC Communiqué related to GAC Advice to the Board. This comment is applicable to all of United TLD’s applied for strings that have been the subject to GAC Advice including: .AIRFORCE, .ARMY, .ENGINEER, .GIVES, .GREEN, .NAVY, .REHAB, and .RIP (the Application Numbers for each are referenced at the end of this Response).

United TLD values the GAC’s advice regarding proposed safeguards for certain applied for new gTLDs and applauds ICANN’s work to formulate additional public interest commitments (PICs) to be adopted by the respective registry operators to address the GAC’s advice. United TLD believes these additional PICs, in conjunction with the strong PIC Dispute Resolution Process that has been designed through close collaboration between ICANN staff and the stakeholder community, is an effective method to implement the GAC’s advice regarding safeguards for the new gTLDs. United TLD urges ICANN to hold the briefing requested by the GAC during the month of January 2014 and approve the adequacy of the PIC specifications for fully implementing the GAC’s advice.

Secondly, with respect to the GAC’s advice to the ICANN Board advising it to re-categorize the string, .DOCTOR, as falling within Category 1 related to highly regulated sectors, United TLD asks the GAC and the ICANN Board to consider the fact that the term “doctor” is not exclusively used

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in connection with regulated medical services. For example, a person who has completed a certain graduate level is a Doctor of Philosophy (PhD) and a person in the United States who is a lawyer has earned the degree Juris Doctor (JD), neither pertaining to regulated medical services. A simple search for “doctor” in various search engines reveals the existence of hundreds of businesses and individuals using the term “doctor” to refer to a specialist who solves an array of problems. A “script doctor” is the term given to a specialist who helps edit and write plays, movies and films. Then there are the individuals who use term in their business such as www.lawndoctor.com, www.plumbingmd.com, and www.kitchendoctorsd.com. Medical practitioners are not the only individuals that use the term “doctor” in connection with expert services nor does the term “doctor” necessarily imply a regulated sector. Consequently, categorizing .DOCTOR as a highly regulated sector is unjustified and unfairly restricts choice and opportunities for those users who identify with being a “doctor” but who are not associated with the medical profession.

United TLD has included all required PICs as well as additional, voluntary PICs into each of its registry agreements with ICANN and looks forward to receiving final confirmation from ICANN that its applications that were subject to Category 1 GAC Advice, may move forward in the contracting and delegation process.

The above Comment applies to applied for strings below:

| <u>Strings</u> | <u>Application Numbers</u> |
|----------------|----------------------------|
| .airforce | 1-1255-29190 |
| .army | 1-1255-29986 |
| .engineer | 1-1255-37010 |
| .gives | 1-1255-39674 |
| .green | 1-1255-2257 |
| .navy | 1-1255-53893 |
| .rehab | 1-1255-34333 |
| .rip | 1-1255-66111 |