New gTLD Program
Initial Evaluation Report
Report Date: 23 August 2013

Application ID:	1-1312-75662
Applied-for String:	FRL
Priority Number:	818
Applicant Name:	Metaregistrar B.V.

Overall Initial Evaluation Summary

Initial Evaluation Result	Eligible for Extended Evaluation

Thank you for your participation in the New gTLD Program. After careful consideration and extensive review of the information provided in your application and the responses to Clarification Question(s), the Evaluation Panel(s) determined that there was not sufficient information to award a passing score. Your application is eligible for Extended Evaluation as defined in Section 2.3 of the Applicant Guidebook.

Background Screening Summary

Background Screening	Eligible

Based on review performed to-date, the application is eligible to proceed to the next step in the Program. ICANN reserves the right to perform additional background screening and research, to seek additional information from the applicant, and to reassess and change eligibility up until the execution of the Registry Agreement.

Panel Summary

String Similarity	Pass - No Contention

The String Similarity Panel has determined that your application is consistent with the requirements in Sections 2.2.1.1 and 2.2.1.2 of the Applicant Guidebook, and your applied-for string is not in contention with any other applied-for strings.

DNS Stability	Pass

The DNS Stability Panel has determined that your application is consistent with the requirements in Section 2.2.1.3 of the Applicant Guidebook.

Geographic Names	Not a Geographic Name - Pass

The Geographic Names Panel has determined that your application does not fall within the criteria for a geographic name contained in the Applicant Guidebook Section 2.2.1.4.

Registry Services	Pass

The Registry Services Panel has determined that the proposed registry services do not require further review.

Technical & Operational Capability	Eligible for Extended Evaluation

The Technical & Operational Capability Panel determined that:

There was not sufficient information provided in the application or in the responses to Clarifying Question(s) in order to award a passing score. The application received a score of zero (0) on one or more questions, and did not receive the minimum required score of twenty-two (22) in the Technical & Operational Capability section for the application to pass. Please review the summary below for more information.

Based on Section 2.3.2 of the Applicant Guidebook, the application is eligible for Extended Evaluation.

Question	Score
24: SRS	0
25: EPP	0
26: Whois	2
27: Registration Life Cycle	0
28: Abuse Prevention and Mitigation	0
29: Rights Protection Mechanism	1
30: Security Policy	1

31: Technical Overview of Registry	1
32: Architecture	1
33: Database Capabilities	1
34: Geographic Diversity	0
35: DNS Service	0
36: IPv6 Reachability	1
37: Data Backup Policies & Procedures	1
38: Data Escrow	1
39: Registry Continuity	1
40: Registry Transition	1
41: Failover Testing	0
42: Monitoring and Fault Escalation	1
43: DNSSEC	1
44: IDNs (Optional)	1
Total	15
Minimum Required Total Score to Pass*	22

No zero score allowed except on optional Q44

Question 24 Summary:

The following Clarifying Question was issued for AGB Question 24 regarding Shared Registration System (SRS) Performance:

"Question 24 of the Applicant Guidebook (AGB) states that the response must demonstrate that 'SRS plans are sufficient to result in compliance with Specification 6 and Specification 10 to the Registry Agreement' and include 'Details of a well-developed plan to operate a robust and reliable SRS.'

Your application response states that 'Latencies and round-trip-times must meet the Service Level Requirements as specified in Specification 10,' and 'All warning and critical thresholds meet the Service Level Requirements as specified in Specification 10.'

The response did not address how the SRS will address the EPP, RDDS, and DNS availability SLRs of Specification 10, and the setting of monitoring thresholds does not necessarily guarantee that availability and response-time SLRs will be met. The response also did not provide a description of how the SRS software and hardware platform is designed to accommodate all the service level requirements of Specification 10. Therefore the evaluation could not determine if sufficient plans are in place to comply with Specification 10 and operate a robust and reliable SRS.

Please clarify the response by describing how the proposed SRS can deliver the Service Level Requirements for EPP, RDDS, and DNS availability as stated in Specification 10."

The response to this Clarifying Question did not fully address the issues raised in the Clarifying Question. The response included a brief description of the EPP servers, RDDS servers, and DNS servers that will be part of the SRS, but did not include any design or testing evidence to demonstrate how the SRS will be able to meet the availability service level requirements of Specification 10.

As compliance with Specification 10 for SRS was not demonstrated, the response was not sufficient for a minimum score on Question 24.

Question 25 Summary:

The following Clarifying Question was issued for AGB Question 25 regarding Extensible Provisioning Protocol (EPP):

"Question 25 of the Applicant Guidebook (AGB) states that the response must describe 'the interface with registrars, including how the applicant will comply with EPP in RFCs 3735 (if applicable), and 5730-5734.' Section 2.1. ('Domain and Host Names') of RFC 5731 states that 'The syntax for domain and host names described in this document MUST conform to [RFC0952] and [RFC1123].'

Your application response to question 44 states that 'The EPP server of the FRL registry will accept IDN labels in UTF-8 Unicode only. Labels in XN-format will not be accepted.' This statement does not comply with RFC 5731. While section 4.1 of RFC 5891 does indicate that submitting U-labels only, while not recommended, is appropriate for an IDNA registration process, the general specification in RFC 5891 is overridden by the specific requirement of RFC 5731 until RFC 5731 is amended or obsoleted. Therefore, the response indicates that EPP implementation will not comply with RFC 5731.

Please clarify the response by indicating how the proposed registry's EPP implementation will comply with RFC 5731."

The response to this Clarifying Question indicated that the registry would accept both A-labels and U-labels. However, accepting U-labels still conflicts with RFC 5731 unless EPP extensions are used, and documentation for the EPP extensions that would be used to comply with Specification 6 EPP RFCs was not provided.

As compliance to Specification 6 EPP RFCs was not demonstrated, the response was not sufficient for a minimum score on Question 25.

Question 27 Summary:

The following Clarifying Question was issued for AGB Question 27 regarding Registration Life Cycle:

"Question 27 of the Application Guidebook (AGB) states that response must 'explain the various registration states as well as the criteria and procedures that are used to change state' and must 'clearly explain any time elements that are involved - for instance details of add-grace or redemption grace periods, or notice periods for renewals or transfers'. Question 27 also states that the response must include 'an adequate description of the registration lifecycle that substantially demonstrates the applicant's capabilities and knowledge required to meet this element'.

Your application response describes various registration states but does not describe any grace periods, and does not describe any time elements except for the length of the 'quarantine' period after a non-renewal. The response also does not describe the EPP domain statuses that may be applied during the various registration states, such as during or after a domain transfer. As such the response was unable to be evaluated as satisfactory.

Please clarify the response by describing the complete registration lifecycle, addressing the items below. The response should include all intervening steps, transitions between the states, and trigger points. As part of the response please:

1) Provide clear explanation of any and all time elements that are involved. Please state what grace periods will exist, and if there will be any please state their lengths. State whether the registry will have an add grace period, and if so how the registry will comply with the AGP (Add Grace Period) Limits Policy, which is an ICANN Consensus Policy. (http://www.icann.org/en/resources/registries/agp/agp-policy-17dec08-en.htm)

2) State whether there will be notice or pending periods related to renewals or transfers, and if so please describe them. Please also describe how the registry will comply with the Registry Requirements contained in the ICANN consensus policy 'Policy on Transfer of Registrations between Registrars' (http://www.icann.org/en/resources/registrars/transfers/policy-01jun12.htm).

3) Describe the EPP domain statuses that may be applied during each registration state, such as during or after a domain transfer."

The response to this Clarifying Question included the EPP domain statuses and stated that Grace Periods will not be implemented. This contradicts the description of the quarantine/undelete scheme also provided in the response, which is functionally identical to a Redemption Grace Period (RGP).

As the quarantine/undelete scheme represents a RGP, and compliance with RFC 3915 was not evidenced, the response was not sufficient for a minimum score on Question 27.

Question 28 Summary:

The following Clarifying Question was issued for AGB Question 28 regarding Abuse Prevention and Mitigation:

"Question 28 of the Applicant Guidebook (AGB) states that the response must provide 'an adequate description of abuse prevention and mitigation policies and procedures that substantially demonstrates the applicant's capabilities and knowledge required to meet this element' and 'details of well-developed abuse policies and procedures'.

Your application response states that 'The registry adheres to the notice and takedown procedures that are commonly practiced in The Netherlands... which state: Any website containing fraudulent material that is unmistakable, indisputable and clearly visible must be taken down as soon as possible. In these cases the registrant or registrar will not be heard, but they will be notified of the takedown. In other cases, where fraud is assumed but not unmistakable or indisputable we will first hear the registrant or registrar and then take appropriate action.' The response also states that the registry will send phishing, malware, and spam URLs to registrars and that 'the Registry-registrar agreement will hold a service level and penalty for registrars not responding.'

However, the response did not provide a description of how the registry operator will determine which cases are clear, which cases are false-positives, and what action may be appropriate for the registry or the registrars to undertake. As such it was not possible to determine the applicant's capabilities and knowledge in this area and whether the policies and procedures are 'well-developed.'

Please clarify the response by providing details of the abuse response policy and procedures, including evidence collection, analysis, action determination, and resolution procedures for abuse matters."

The response to this Clarifying Question provided further detail on abuse prevention measures and included some abuse cases. However, the response still lacked specific procedures for many abuse items, including those that will be handled by the registrar. Additionally, the response did not include procedures for how the registry will follow up to ensure that registrars have successfully resolved abuse cases delegated to them.

As this information was not provided, the response was not sufficient for a minimum score on Question 28.

Financial Capability	Eligible for Extended Evaluation

The Financial Capability Panel determined that:

There was not sufficient information provided in the application or in the responses to Clarifying Question(s) in order to award a passing score. The application received a score of zero (0) on one or more questions, and did not receive the minimum required score of eight (8) in the Financial Capability section for the application to pass. Please review the summary below for more information.

Based on Section 2.3.2 of the Applicant Guidebook, the application is eligible for Extended Evaluation.

Question	Score
45: Financial Statements	1
46: Projections Template	1
47: Costs and Capital Expenditures	1
48: Funding and Revenue	0
49: Contingency Planning	2
50: Funding Critical Registry Functions	1
Total	6
Minimum Required Total Score to Pass**	8

No zero score allowed on any question