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 IV of the GAC Singapore 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 Singapore GAC Advice" (for example "1-111-11111 Response to Singapore GAC Advice"). All GAC Advice Responses to the GAC Singapore Communiqué must be received no later than 23:59:59 UTC on 02-May-2014.

Respondent:

Applicant Name	TLDDOT GmbH
Application ID	1-1273-63351
Applied for TLD (string)	GMBH

Response:

We are the only community-based applicant for the extension .GMBH and are being supported by the GMBH community including the respective governments of the countries where GMBH is a corporate identifier. We would like to comment to the GAC Singapore communiqué as follows:

We appreciate the re-iteration of recommendations for category 1 strings, which denotes the insufficient protections created by the non-binding nature of public interest commitments (PICs) and the necessity for verification of registrant data for Category 1 strings. We also echo our past comments made to the GAC Early Warnings and GAC Advices.

We have worked for over four years with the GMBH community and oversight governing bodies to ensure that the safeguards that a corporate identifier gTLD such as .GMBH deserves are implemented properly. The verification of registrants and registrant data is as major part of this and has been documented with our application. Additionally the respective governments of Austria, Germany and Switzerland have articulated their requirements to ICANN, too. We are consistent with those requirements as well. None of our competitors has taken such in-depth efforts.

As community-based applicant we are responsible for the all over quality of the management of the corporate identifier .GMBH. The verification of the registrant and domain names, community involvement, control mechanisms and a policy council are integral part of the DNA of our application. Other applicants who were unable to delineate specific policies and mechanisms in their applications or to adhere to GAC recommendations should not be awarded category 1 strings. Their PICs should not be considered sufficient to protect a sensitive TLD like .GMBH. It is also important to note that the GAC communiqués continued to support community-based applications and their safeguards. We also reiterate that community-based

applications represent by far the strongest form of binding commitment to continued protections over time and are the most closely formatted to meet GAC recommendations.

We encourage ICANN to provide the GAC with specific responses in relation to the concerns listed in the GAC Singapore communiqué. ICANN should not try to minimize the potential damage that could be done to both registrants and end-users should corporate identifier TLDs like .GMBH be awarded to irresponsible applicants.

We additionally advise ICANN that it is against competitive rules to allow applicants to upgrade their applications in order to comply with the GAC requirements. It is better for registrants and end-users not to approve any of the applications for a corporate identifier rather than to approve a cobbled application that consists of un-sufficient policies, PICs, Change Requests, Safeguards and other anti-competitive plaster.

Therefore we hope that ICANN comes up with concrete, enforceable requirements and sustainable protection mechanisms that are binding for applicants and echo the GAC's requirements and the individual GAC member responses to particular strings.

Dirk Krischenowski
CEO and Founder

30 April 2014