

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, Annex I, and Annex II of the [GAC Beijing 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 GAC Advice” (for example “1-111-11111 Response to GAC Advice”). All GAC Advice Responses must be received no later than 23:59:59 UTC on 10-May-2013.

Respondent:

Applicant Name	Big Room Inc.
Application ID	1-912-59314
Applied for TLD (string)	eco

Response:

Dear ICANN,

Big Room Inc. and the Dot Eco Global Community Organization welcome the opportunity to respond to the Advice contained in the 11 April 2013 ICANN Governmental Advisory Committee (GAC) Communiqué.

The specific recognition by the GAC of the importance of “the clear and collective opinion of a community on a gTLD where the community is impacted by that gTLD application” is an important and timely contribution to the new gTLD process given the approaching community-priority evaluations.

The GAC has also recommended that ICANN establish additional safeguards for all new gTLDs; specific safeguards for strings that are linked to regulated or professional sectors; and further targeted safeguards for strings associated with market sectors that have clear and/or regulated entry requirements.

The GAC specifically advised that ICANN ensure that registries of environment-related gTLDs – including .eco – require registrants to agree to compliance with applicable laws, to undertake validation, and to agree to periodic checks that ensure validity of relevant authorisations, charters, licenses and/or other related credentials for participation in the sector. We strongly agree with and support this advice.

Big Room’s community-priority application for .eco is unique amongst all environment-related strings in its recognition of these important consumer protection mechanisms and engagement with the affected community.

This commitment to maximizing community benefit from the .eco domain and minimizing harm is reflected in the .Eco Consensus, a charter for the .eco domain negotiated with leading members of the environmental community.

As evidenced by our approach to date, we firmly believe that the Internet user more likely to be harmed by environment-related gTLD registries that do not require compliance with applicable laws and validation of environmental credentials, than by registries that do.

The “Regeneration Consumer Study ” is an online survey of consumer attitudes, motivations and behaviours around sustainable consumption among 6,224 respondents in six major international markets (Brazil, China, Germany, India, United Kingdom and United States). It was developed by BBMG, GlobeScan and SustainAbility and fielded during September and October 2012.

The study found that “consumers across all six markets look to certification seals or labels on product packaging (40%) as the most trusted source of information about whether a product is environmentally and socially responsible.” This suggests that the average consumer finds external verification of environmental claims helpful.

The study also found that the least trusted source of information was traditional company communications. According to the study, “barely one in ten consumers rely on company advertisements or website content, reinforcing the perception that the most reliable claims often come from sources largely beyond a company’s control.” This suggests that the average consumer finds environmental claims that are not externally verified unhelpful.

This understanding that externally verified environmental claims are helpful while unverified environmental claims are unhelpful is a key basis for many government consumer protection policies on environmental claims.

To explore whether this extends to environment-related gTLDs, in February 2012 Vision Critical, on behalf of Big Room Inc., conducted a survey to understand public expectations of the term eco and of the .eco gTLD in particular. The results suggest that it does, with 58% of respondents indicating they would expect domain names ending in .eco (e.g. www.anyname.eco) to be members of an environmental organization, professional association or have made a specific commitment to the environment.

This is also a key reason why the environmental community has expressed a consensus view that the .eco gTLD should be ‘community-designated’. Indeed, as Big Room Inc.’s .eco application explains:

“The purpose and principles outlined in the .ECO Policy Consensus define what .ECO will mean as an active expression of the goals, values and interests of the Community. All major international membership organizations (e.g. IUCN, WWF, Greenpeace), the largest global business and environment organizations (e.g. World Business Council for Sustainable Development, Green Economy Coalition), the largest international Community alliances (e.g. 350.org, TckTckTck) and the key global environmental reporting standards (e.g. Global Reporting Initiative, Carbon Disclosure Project) support the creation of .ECO as a Community TLD. The United Nations Environment Programme (UNEP) has been an observer to the .ECO community

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process since 2010. These institutions represent over 190 countries, 1,000 entities, and more than 10 million individual members.”

This and other supporting evidence, in combination with community and governmental support, suggests that a safeguard-oriented approach to environment-related gTLDs is appropriate. The question then becomes how to implement it.

First, a mandatory “Additional Safeguards Specification” for affected gTLDs within the Registry Agreement that is based on these principles would be useful.

Second, guidance on how best to harmonise linkages between the PIC Specification, Section 2.19 & Specification 12 (for community-based gTLDs) and any new Additional Safeguards Specification in the Registry Agreement would also be helpful.

Big Room Inc. .Eco Application Compliance with GAC Proposed Safeguards

Big Room Inc., as .eco gTLD applicant on behalf of the environmental community, has translated the .Eco Policy Consensus – an environmental community charter for .eco – into a framework established by ICANN for the governance of community-based gTLDs.

This Consensus is the result of an independently mediated multi-stakeholder process that reflects public policy designed to protect Internet users and is representative of community interests and goals vis-à-vis the .eco gTLD.

Should Big Room Inc. be in a position to act as registry for the .eco gTLD on a community basis, we intend to comply with all recommended GAC safeguards in line with community expectations as explained in the .Eco Consensus.

Indeed, most if not all of these safeguards pre-exist in our responses to questions 18 & 20. We have also affirmed our intention to implement them by submitting a PIC Specification that covers our responses to these responses. We note that we were one of the only new gTLD applicants to take this step.

We look forward to ICANN guidance on how to integrate them into our application and/or registry agreement for the .eco gTLD, or through other mechanisms agreed by the community.

Sincerely,

Jacob Malthouse
Co-founder & Director, Big Room Inc.

Trevor Bowden
Co-founder & Director, Big Room Inc.

Richard McLellan

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Co-chair, Dot Eco Global Community Organization & Director, Footprint, WWF International

Helio Mattar

Co-chair, Dot Eco Global Community Organization & President, Akatu Institute for Conscious Consumption

References:

The Regeneration Consumer Study is an online survey of consumer attitudes, motivations and behaviours around sustainable consumption among 6,224 respondents in six major international markets (Brazil, China, Germany, India, United Kingdom and United States). Fielded in September and October 2012, the study represents a holistic exploration of sustainability market trends, priorities and engagement pathways, including information on sustainable consumption, trust, transparency, social issues, behaviour change, consumer collaboration, participation and advocacy actions. Data across all six international markets reflect a margin of error of +/- 1.3 percent. Specific country-level data reflect a margin of error of +/- 3.1 percent.

The Big Room .eco survey is a random online omnibus survey of 1,016 US adults from diverse ages, incomes, ethnicities and regions, conducted 15-16 February 2012 among a sample of Americans who are also Springboard America panel members. The margin of error, which measures sampling variability, is +/-3.10%, 19 times out of 20. The sample was balanced by age, gender and region according to the most recent American Community Survey (2009).

See Big Room Inc. .eco gTLD application (1-912-59314) public response to question 20 (d) for an indicative list of applicable national and international policy on environmental consumer protection legislation.