

Dot Registry Response to Durban Communiqué  
8/18/13

As the only community applicant for the extensions: “.INC”, “.LLC”, “.CORP”, and “.LLP” Dot Registry, LLC has followed the GAC process closely. We were extremely grateful for the issuance of the Beijing Communiqué, which placed an important spot-light on the need for Category 1 Safeguards. Now after the meeting in Durban we find ourselves again applauding the GAC’s straightforward directions in relation to the review and importance of community applications.

The community application process is tedious. It has taken us several years to establish an open and supportive relationship with the Community of Registered Businesses in the US and the governmental authorities charged with their registration, monitoring, and protections. On July 21, 2013 the National Association of Secretaries of State (NASS) whose members consist of the Secretaries of State and Lieutenant Governors of the fifty states and US territories, which are charged with the administrative oversight of business registration within their respective states, unanimously passed a resolution directed to ICANN in relation to the issuance of the corporate identifier strings named in our applications. Specifically noting the, “potentially negative impacts of issuing generic gTLDs as corporate extensions, which we believe do not have the enforceable safeguards to protect against misuse and could ultimately have a harmful effect on entities that are legally registered in the U.S.”. NASS went on to further express their support for the GAC advice in regards to Category 1 Safeguards and the undeniable need for appropriate oversight in order to adequately protect the US Business Community.

Throughout the application process Dot Registry has strived to not only meet, but exceed the expectations of the community we represent and have modeled our registration policies off of regulatory bodies within the US that currently protect and monitor our community. The Durban Communiqué urges ICANN to not only give “ preferential treatment to community applications with demonstrable community support”, but also to, “ take a better account of community views” in order to frame the most positive impact on the communities as a whole.

In the last two years ICANN has been flooded by communication from Secretaries of State and members of our community urging them to not only view the Community of Registered Businesses as a valid community, but also to hear the operational concerns related to the creation of these strings. The use of the extensions: “.INC”, “.LLC”, “.CORP”, and “.LLP” imply a level of trust amongst US consumers. The issuance of these strings in a non-community format not only provides for the continued mis-representation of shell corporations and fraudulent entities online, it additionally creates a breeding ground for consumer confusion. We would encourage ICANN to heed the warnings of both the GAC and NASS in this review process, taking into account the clearly expressed opinion of our community in regards to how these strings should be allowed to come to market.

Dot Registry, LLC

Much concern and discussion has recently been created over the delay of Community Priority Evaluations, the lack of clear standards for community evaluators and the unclear timeline imposed by both the lack of finality in the GAC advice and ICANN's unclear direction in regards to advice adoption and implementation. In a program that has seen countless delays and setbacks we no longer can afford to wait. A vague timeline for string issuance creates unnecessary disadvantages for applicants in the consumer market. Further delays in adopting the GAC advice will create hardship amongst the applicant community. It is time to be pro-active. The GAC has laid an impressive framework to guide ICANN through the concerns of consumers, countries, and communities it is now up to ICANN to step up to the plate. We hope as a community applicant and an engaged member of this process that ICANN will push for the immediate start of CPE, the development of an oversight process to evaluate the merit of applications in relation to GAC advice, and the efficient handling of the review process.