

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	HEXAP SAS
Application ID	1-1192-28569
Applied for TLD (string)	MED

Response:

ICANN
Board of Directors
12025 Waterfront Drive, Suite 300
Los Angeles, CA 90094-2536

Paris, April 30th, 2014

Dear Members of the Board of Directors,

HEXAP welcomes the Singapore GAC Communiqué published on March 27th, 2014 and considers the statements of the GAC meet the expectations and wishes of the Internet Community by saving the public interests.

1. **GAC Advice #2: safeguard advice applicable to all new gTLDs and Category 1 and Category 2 strings**

Applying for .MED, a string dedicated to a regulated sector and with restricted registration policies, HEXAP would like to recall its answer we respectfully submitted to the Beijing GAC Advice¹. This document exposed how a permanent sunrise is monitored by HEXAP's Medical Clearinghouse which will be active for each and every domain name registration and will form an intrinsic part of the domain name lifecycle. The Medical Clearinghouse will be operated for registrant's occupation identification and continuous licence checking among other services offered to the community in order to maximize transparency and build confidence.

Moreover, HEXAP reviewed with great interest the ICANN NGPC RESOLUTION No. 2014.02.05.NG01 where Specification 11 public interests commitments are consistent with HEXAP safeguards. These safeguards are mainly detailed in our responses to Questions 18b, 20e and 26 and described in the answer to Beijing GAC Advice.

The purpose of the MED gTLD is to establish a stronger trust between patients and health care providers on the Internet. For this matter, all disclosable professional data collected by the Medical Clearinghouse that has been verified will appear on the WHOIS as described in our responses to Questions 18b and 24. This procedure will be in place in order to strengthen data accuracy when the registrar temporary fails to provide up-to-date information or provide more information regarding the occupation of the registrant.

¹<http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-1192-28569-en.pdf>

2. GAC Advice #3: Community applications

HEXAP is pleased to read the third GAC Advice asking for a preferential treatment of community applications. We do believe the mechanisms of an accountable community application are the safest way to protect the best interests of the patient on the Internet.

HEXAP's .MED:

- is the only community health-related application (with .PHARMACY), hence endorsed by recognized community institutions with a global and substantive representation;
- has a clear policy with comprehensive registration rules for each kind of registrant by dint of our Medical Clearinghouse;
- limits the registrant list to: Practitioners, Healthcare Facilities and Institutions, and excludes health-related businesses (such as insurances) and individuals;
- requires strong commitments towards the patient; among them (quoting the response to Question 20e): *« the registrant of a domain name will be committed to serve and share information aimed at patients, always considering the best interests of patients, their dignity and privacy. The registrant commits to provide information in accordance with the state of the art (scientific sources), and that is honest, clear, appropriate and meets the needs of patients with whom they engage under the .MED domain name. »*;
- requires a strong eligibility for choosing a given domain name label.

The nature of the community application ensures the best guarantee for a top to bottom accountability: ICANN, the registry supported by the Medical Clearinghouse, the accredited registrar and the licensed healthcare provider registrant.

Furthermore, it extends the ICANN multi stakeholder model to a TLD, making it in a way superior to a sTLD merely endorsed by only one organization. Indeed:

- As described in our response to Question 18b, the registrant professional credential *« are checked for every domain name creation, renewal, transfer and trade. This information will also be monitored by the .MED scientific council and accredited medical colleges, and will be open to any authority wanting to be a .MED stakeholder and supervise regional and professional scoped registrations. »*.
- As described in our response to Question 20e, *« the registrant must acknowledge that any supervising authority will be entitled to request the Registry Operator to suspend a domain name if such domain name is used in an illegal manner, or if the registrant no longer meets the eligibility requirements. »*

For the record, these commitments from HEXAP were written before the establishment of the Public Interest Commitments Dispute Resolution Procedure. They meet in fact the Category 1 implementation framework of the NGPC which requires

« the creation of a working relationship with the relevant regulatory or industry self-regulatory bodies by publicizing a point of contact and inviting such bodies to establish a channel of communication, including for the purpose of facilitating the development of a strategy to mitigate the risks of fraudulent and other illegal activities ». We also hope these commitments will be welcomed by the ALAC who recently asked for a Policy Advisory Board for sensitive strings.

In general, HEXAP believes that underscoring the role of a community may avoid the loss of opportunity to see one and only application that serves both patients and healthcare providers best interests, and the risk that a portfolio applicant with opaque policies, which would even use a respectable community member as a proxy, may succeed.

3. Conclusion

HEXAP wholeheartedly agrees with the GAC to increase the focus on the community applications. The .MED has been identified as a sensitive string which requires accountability and transparency. Those criteria are fulfilled by HEXAP as a community applicant for a regulated sector by deploying:

- a responsible domain name registration process with highly restricted rules defined by clear policies;
- a Medical Clearinghouse dedicated to monitor the registrant identity at all time and the fair use of its domain names for the patient best interests;
- a reliable WHOIS service providing advanced information regarding the qualification of the registrant;
- its best efforts of cooperation and openness to all stakeholders of the medical sector.

Sincerely,

Dr. Raphaëlle Laubie
President

