

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 Communique](#) 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	Charleston Road Registry Inc.
Applicant ID	1-1141-50966
Applied for TLD (string)	.SEARCH

RESPONSE:

Introduction

We thank the ICANN Board for the opportunity to respond to the Governmental Advisory Committee (GAC) Advice and for considering the points made in this response. In all, Charleston Road Registry, Inc. (CRR) received advice on 31 of its applied-for strings. This response specifically addresses concerns described in Section IV, Annex I, Category 2.2 – Exclusive Access for CRR’s .SEARCH application.

We also thank the GAC for the time and effort we know must have gone into the preparation, drafting and issuance of its advice. We recognize the difficult work the GAC undertakes and appreciate the important role the GAC plays within the multi-stakeholder process. We were happy to see the GAC reach consensus on many important issues.

CRR has always been and remains very committed to the security and stability of the domain name system as well as the success of the new generic top-level domain (gTLD) program and it is in that spirit that we submit the following response to the GAC Advice.

CRR's Response to Category 2.2 - Exclusive Access Safeguard Advice for .SEARCH

CRR notes .SEARCH is a listed string under the GAC's Category 2.2 Exclusive Access safeguard advice. Our application for .SEARCH was originally submitted to ICANN as an exclusive access TLD. On March 7, 2013 CRR submitted [Public Comments](#) responding to the Board's request for input on "Closed Generic" applications. On page seven of our public comments, we acknowledge the concerns around "closed-generics" and state: "we intend to work with ICANN, the Government Advisory Committee (GAC), and other members of the relevant communities to amend our applications" to address these concerns. Further, on April 6, 2013, CRR sent a [letter](#) to Christine Willett, ICANN's New gTLD Program General Manager, including our change request for .SEARCH, which modifies the application from an exclusive access model to a restricted access TLD model. Exclusive access model means the TLD is limited to the exclusive use of the applicant, whereas our restricted access model means the TLD is open to all ICANN-accredited registrars, and registration of a domain name in the TLD will be open to those who meet registrant restriction guidelines. Therefore, it is our belief that CRR's application for .SEARCH is not a member of the GAC's Category 2 - Exclusive Access safeguard advice.

Conclusion

CRR believes its .SEARCH application does not fall under Category 2 - Exclusive Access safeguard advice. It is our understanding that Category 2 - Exclusive Access safeguard advice addresses GAC concerns around .SEARCH applications that are limited to the exclusive use of the applicant. As described above, CRR's .SEARCH application does not meet this definition. Therefore, we respectfully request that CRR's application for .SEARCH not be considered a member of the GAC's list of applications subject to Category 2 - Exclusive Access safeguard advice.

We would like to thank the Board for its consideration of our response, and we look forward to continuing the dialogue with the Board, the GAC and the ICANN community regarding the new gTLD program.