

# 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	Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti.
Application ID	1-2128-55439
Applied for TLD (string)	persiangulf

## Response:

I am writing to you as CEO of Asia Green IT System (hereafter "AGIT"). We are the sole applicant for Dot PERSIANGULF and our application is currently in Initial Evaluation with priority number 1069.

Our application has received no String Confusion Objections, no Existing Legal Rights Objections and no Limited Public Interest Objections. It has received a Community Objection from the Gulf Cooperation Council.

The GAC's Beijing Communiqué dated April 11, 2013 identified Dot PERSIANGULF as a string which may warrant further consideration by the Governmental Advisory Committee and cites the next ICANN Meeting, to be held in Durban (South Africa) from July 14 to 18, 2013, as a possible next step for the GAC in this regard. As such, the GAC has requested that the ICANN Board not proceed beyond Initial Evaluation for this application.

We are more than happy to engage in discussions with both the GAC and the ICANN Board to further explain our plans for this TLD beyond the full application we have already submitted to ICANN. We see this response as part of these discussions and welcome further engagement as required.

However, we feel strongly that we should not suffer unwarranted extra delays at this stage of our application. This TLD stands to have extremely wide reaching benefits. The total population of the countries in the Persian Gulf region exceeds 120 million. All of them feel in some way linked to this region.

We have set ambitious goals for this TLD and these are inline with the goals ICANN and its community have set for the new gTLD program as a whole. The second sentence of the 338-page long Applicant Guidebook reads: "The new gTLD program will open up the top level of the Internet's namespace to foster diversity, encourage competition, and enhance the utility of the

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DNS." We very much share that ambition and we believe that Dot PERSIANGULF, will significantly enhance and empower its users.

Dot PERSIANGULF is historically and culturally linked to the Middle Eastern people but beyond this, it has the potential to cut across national borders and unite the great number of people worldwide that have ties in the region, including businesses, cultural institutions, civil society, NGOs and religious organizations.

Dot PERSIANGULF is not a geographic TLD. We did not class it as such in our application, and this was just recently confirmed by the findings of ICANN's Geographic Names Panel (GNP) (see February 28, 2013 letter from ICANN Vice President, gTLD Operations Christine Willet to the GAC Chair). The GNP found both applications that had self-designated as geographic names yet did not meet the criteria for that classification, and applications that had not self-designated as geographic names but should have done. It found Dot PERSIANGULF to be in neither category, showing clearly that our application does not fall within the geographic names requirements as defined in the Applicant Guidebook (including the requirement for support/non-objection).

Dot PERSIANGULF aims to unite around a common interest. The region has in recent times been named "Arabian Gulf" by some. Throughout history it has been named "Persian Gulf" by most. The name is more cultural than geographical and clearly, no one state can claim exclusive rights to it.

As such, we were naturally dismayed to learn that some countries had called for our TLD to be named in the GAC's Beijing Communiqué. Our understanding is that these are individual initiatives and do not represent the view of the governments as a whole. This important point highlights that although there are differences of opinion in some countries about the term "Persian Gulf", this term does actually represent a very wide community. A quick look at publicly available data on the Internet (such as this: [http://en.wikipedia.org/wiki/List\\_of\\_countries\\_by\\_population](http://en.wikipedia.org/wiki/List_of_countries_by_population)) shows that over 77 million people stand to benefit from the creation of a Dot PERSIANGULF.

Clearly, specific interests should not be allowed to derail this application process. Similarly, the GAC should not be used by a few as an avenue to exercise content control and prevent millions from reaping the benefits promised to them by the new gTLD program in general and our TLD in particular.

This was highlighted by the comments made by the Independent Objector when he was called upon to examine our application. The IO considered our application for Dot PERSIANGULF not because he felt it was problematic, but simply because it had received several comments. It is in the IO's purview to determine whether applications that appear controversial should in fact raise concerns. For Dot PERSIANGULF, the IO noted that "most of the comments against the application raise identical issues" and that "there are several comments supportive of the application."

Further, he had the following conclusions:

"The IO is of the opinion that an objection against the gTLD “.persiangulf” on the limited public interest ground is not warranted."

"The IO is of the opinion that it would be unadvisable for him to file an objection against applications for the new gTLD “.Persiangulf”."

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The IO's conclusions show that the case against Dot PERSIANGULF being made to the GAC by the objectors is not as clear-cut as it is made out to be. Clearly, the GAC should not be used to block this TLD through GAC Advice when there is an objection procedure ongoing. That is the right avenue to ascertain whether this TLD application should be allowed to proceed or not. We trust the GAC will agree that it should not be used by objectors as "insurance" against a possible unsatisfactory outcome of the procedures they themselves have initiated through the new gTLD program's objection handling mechanisms.

Best regards,

Mr. Mehdi Abbasnia  
Chief Executive Officer  
Asia Green IT System  
Turkey