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Comment on the second draft Applicant Guidebook

Dear Mr Twomey

To reaffirm the comments we submitted regarding the first Draft Applicant Guidebook, we would like to comment on the second draft of the Applicant Guidebook as follows:

1.) Application, Evaluation Fee and Annual Fees

As we have stated before, our potential application is based on a community of a few million people in the region of the City of Cologne, Germany.

It will serve the public interest by creating second-level domains and connected services that add value for governments, authorities, and the people making up our community. Looking at the size of the potential market for second level domains within the gTLD “.köln”, the proposed evaluation fee of US\$ 185,000 for one gTLD string seems to be too high. We therefore suggest the evaluation fee to be lowered considerably to improve the economical conditions for regional gTLDs. The overall fees for the first three years of operation should not exceed US\$ 100,000 for new gTLDs.

2.) Multi-String and IDN Applications

The proposed US\$ 185,000 evaluation fee is meant for one gTLD string per application. In many cases, the native names of a geographic location such as cities and regions are different from their names in other languages and scripts. There may be several variations for one and the same location, in particular if the place is in the non English speaking world. Köln is a perfect example of both this specific issue and of a Top-Level-Domain that contains IDN-characters, the so-called “Umlaute”. The city is known as Köln (or Koeln) in German speaking countries and as Cologne in English and French speaking communities, whereas other Latin idioms call it Colonia.

According to the Draft Applicant Guidebook, initiatives which intend to apply for a TLD need to choose one string, either with or without the Umlaut. This practice will confuse parties that wish to use e-mail addresses

or to find websites. This practice also bears the risk that a second or third registry will be established with the available versions of the city or region name, which would mean inappropriate confusion of the internet community. Therefore we suggest that an application may comprise more than one string with and without the “Umlaut” at a combined, reduced application fee and that the annual fee will be limited to one fee for all strings since the operation of the registry will be the same. In our case, we would file an application for “.köln”, which might include “.koeln”, “.cologne” and “.colonia” as the most widely spread spellings. Besides making sense for us, we also see potential benefits for ICANN, as this would be a clear statement in favour of a transparent gTLD landscape and keep additional evaluation and dispute workload from the organisation.

3.) Timeline

The application window for new dTLDs has repeatedly been delayed by ICANN and up to now, no definite time frame is in sight. Setting up a reliable and executable business plan is crucial for gathering the funds to finance the application and operation process from the very start until the final filing of the application and further on into the actual start of the new gTLD. The uncertainty of the timeline puts the reliability at risk and makes financial budgeting just as difficult as the planning of the business activities.

We therefore urge ICANN to present a final and reliable date for the first round of applications and to stick to the original plan to offer a second round within one year after round one has been completed.