

We participated and contributed in the new gTLD process from the very beginning in 2005 and many of our ideas and previous comments were incorporated in the current version of the Applicant Guidebook. For the 2<sup>nd</sup> draft we again have some comments and change requests by which we are aiming to get a fair treatment on our way to acquire an own identity for the Berlin community on the Internet.

## Please reduce the Evaluation Fees and Annual Fees!

The economic perspective of the .berlin top-level domain is likely comparable to a well developed ccTLD which has a similar sized community. By this the .berlin domain registrations could be forecasted to about 100,000 domains; this is comparable to Ireland (122,000 .ie domains) or Latvia with less than 100,000 domains.

The .berlin TLD will offer choice and diversity to the German Internet community and will create competition to Germany's ccTLD .de (currently 12.5M domains at an end user market price of US\$ 5), operated by DENIC.

Having spent over US\$ 2,000,000 already from the beginning of the New gTLD process in 2005 and obliged to pay additional US\$ 185,000 evaluation fees and at least US\$ 25,000 annual fees to ICANN, **the upfront economic burden on the expected number of 100,000 .berlin domains is at least US\$ 22 per domain!** By this fact any choice, diversity and competition is stopped even before the birth of .berlin.

Together with our comments made on the 1<sup>st</sup> Draft Applicant Guidebook (e.g. smooth application processing, German and European competition laws) we call ICANN to reduce the application fees for cityTLDs to not more than US\$ 50,000 and the annual fees to not more than US\$ 10,000 minimum annual fees.

## Please tell the World a reliable New gTLD Timeline!

We appreciate the work ICANN staff did so far, especially Kurt Pritz, Karla Valente and Karen Lentz made tremendous efforts to implement the guidelines, take care of all the comments so far and drive the implementation of the New gTLD Process to an successful launch. Nevertheless it is a scandal that ICANN did not publish any reliable timeline at this time. A reliable timeframe is relevant for all parties affected, from back-end provides, registrars, to the distinct community for the TLD, and the TLD applicant itself. Therefore we urge ICANN to catch up on this as soon as possible.

Author is Dirk Krischenowski, Founder and CEO of the .berlin top-level domain initiative, Berlin, March 25, 2009