

# dotKoeln Comments on the Draft Application Guidebook V3

Our .koeln TLD project represents Cologne-based businesses, organizations, and individuals and has seen a rapidly growing support by the local business community, local and state politics as well as individuals. For the3rd Draft Applicant Guidebook we have comments and change requests by which we are aiming to get a fair and timely treatment on the way to acquire our own identity on the Internet.

# Creating Competition does not have to create Lower Prices for Domains

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Competition in the domain business is not necessarily associated with lower domain prices.

Competition will offer the users a wider choice of products and services.

New gTLDs and especially new geoTLDs will create additional values as they enhance new business and communication models .

An eventually slightly more expensive .koeln domain has the potential to create better search engine rankings and thus more potential revenues for businesses.

In the end, the pice difference to a .de or .com domain will be overcompensated by additional revenues.

If there are concerns about pricing issues, lowering both the evaluation fee and the annual fees should be considered seriously.

There is a clear Demand for GeoTLDs

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City and Geo TLDs are always mixed up with other new gTLDs in the discussion

about economic parameters. First of all the studies conducted by the German Internet

Association eco and dotBERLIN have show that e.g. 80% of businesses would be interested to register

a .city domain name and 43% of individuals would consider "www.mayor.city" as their preferred



domain name to find the Berlin of their city.

Secondly we do not see any economic consultant or ICANN in the position to decide if a city or geographic region has a demand for its own identity.

In the upcoming economic studies it should be regarded as a fact that there is a significant demand of cities, cultural, linguistic and geographic regions for their own TLD.

New gTLD Applicants need a Timeline!

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We urge ICANN to proceed with the introduction of new gTLDs. Arguments on this topic have been articulated on plenty occasions by new gTLD prospects and other members of the ICANN community, we do not want to repeat them here.

Thomas Lenz, CEO of dotKoeln Top-Level-Domain GmbH