

July 21, 2010

Dear ICANN,

I do appreciate the opportunity to provide my comments on the Draft Applicant Guidebook version 4.

1. Application fees

I think a special consideration should be given to applicants from developing countries that represent cultural, linguistic, or geographical communities particularly with respect to technical requirements as well as fees. This is consistent with the advice of the GAC set forth in their Brussels communication: "It therefore urges ICANN to set technical and other requirements, including cost considerations, at a reasonable and proportionate level in order not to exclude developing country stakeholders from participating in the new gTLD-process."

2. Objection fees

I suggest that there are no fees imposed on governments in case they submit objections to individual applications particularly if objections are for protecting public interest.

3. Variants

Variants TLDs should be supported and delegated to the same TLD holder as blocking or reserving them will deprive certain group of users of the right to access the Internet in their language using the available input device (e.g., keyboard).

4. Background Check

In reference to DAG 4, section 1.2.1, "Eligibility," and 2.1, "Background Check," I am personally very deeply concerned regarding the DAG 4's insertion of the term "terrorism" so arbitrarily as part of the background check on applicants and without providing any definition or criteria that would be measured against approving or denying an applicant for a new gTLD or IDN gTLD.

My concerns are that background checks in this area of terrorism, as it is presented in the DAG 4, without any definition, is unacceptable to many people, language communities, and faith communities around the world.

While the international community is extensively divided on who is a terrorist and who is a freedom fighter, and notwithstanding ICANN's lack of definition whatsoever in the DAG 4 on terrorism, it is a surprise to me to see ICANN involving itself in the area of terrorism while its mandate is only being a global technical coordinator.

It is recommended that clear and internationally recognized definitions and measures be included in this section or a removal of this part.

5. Vertical Integration

The addition of the vertical integration rules to the DAG may have negative consequences on applicants who seek to hire third parties to provide backend registry services. The effective choice becomes extremely limited. I strongly believe that requirements on vertical integration should be removed to avoid this problem.