

July 21, 2010

Dear ICANN,

We appreciate the opportunity to provide our comments on the Draft Applicant Guidebook version 4. We also appreciate the efforts and dedication of the individuals who have spent so much energy on the introduction of the new gTLDs, in particular, that of geographical TLDs.

Japan Internet Domain Name Council (JIDNC) is a private sector-led membership organization established in September 2009 to facilitate the smooth introduction of both new IDN ccTLD for Japan and geographical TLDs for local governments in Japan and thus contribute to the sound development of the domain name market in Japan.

We hereby submit our comments on behalf of the Geographical Name Working Group of the JIDNC focusing on the geographical names.

We hope ICANN will consider them seriously and constructively.

Sincerely,

Koichi Utsumiya

Chair, Geographical Name Working Group
Japan Internet Domain Name Council

Member of JIDNC:

EC Network
Internet Association Japan (IAJapan)
Japan Computer Emergency Response Team Coordination Center (JP CERT/CC)
The Association for Promotion of Public Local Information and Communication (APPLIC)
Local Authorities System Development Center (LASDEC)
Telecom Services Association
Telecommunications Carriers Association (TCA)
Japan Internet Providers Association (JAIPA)
Japan Cable and Telecommunications Association (JCTA)
Japan Network Information Center (JPNIC)
Japan Network Security Association (JNSA)
Japan Federation of Bar Associations (JFBA)
Institute for HyperNetwork Society (IHNS)
Mobile Content Forum (MCF)
Japan Domain Name Business Association (DNBA)

JIDNC Homepage: www.jidnc.jp

Comments on the Draft Applicant Guidebook version 4
JIDNC Geographical Name Working Group

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1. Special consideration including application fees

First of all, we would like to request that special consideration be applied to small cities as well as small cultural and linguistic communities which do not intend to compete with general commercial TLDs such as .com or new brand TLDs in general. This includes the reduction of application fee of \$185,000 and annual fee of \$25,000. The local cities as well as cultural and linguistic communities are diverse in size and many are economically small thus the current level of fees is not affordable for them. However, we understand that lower but appropriate application fee is still needed in order to prevent excessive applications.

2. Objection fees be exempted for governments

We request that ICANN should not impose any fees to individual governments including local governments which intend to submit objections to individual applications. We believe such objections are based on public interest and therefore should be exempted from general commercial practices.

[END]