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Date: April 15, 2011
Via email

To: Peter Dengate Thrush, Chairman, ICANN
        Rod Beckstrom, President and CEO, ICANN

Re: **Regional (Macro Geographic Region) Initiatives for the New gTLD Process**

Dear Peter and Rod,

First of all, we congratulate the progress ICANN is making on the implementation of the new gTLD program. As we look forward to the positive implementation of new gTLDs, we also look forward to the implementation in a manner that is conducive to the development of local communities in recognition of their diversity. The introduction of IDN gTLDs is especially important for the Internet community in Asia. DotAsia, along with many of our colleagues in Asia, have been working hard to make IDN gTLDs a reality, and with the introduction of IDN ccTLDs, users increasingly expect IDN gTLDs to be accessible.

In our original application submitted to ICANN in 2004, DotAsia became perhaps the first gTLD proposing considerations for IDN gTLDs. IDN gTLDs for ".ASIA" is integral and critical to the DotAsia initiative and community. We therefore observe with anxiety the development of the New gTLD Applicant Guidebook, especially the provisions for macro geographical names.

Studying the recent GAC Scorecard, we are very much supportive of the early-warning concept proposed and agree with the national sovereignty considerations regarding geographical names. In fact, the DotAsia experience, in our original application, can probably be considered as the first successful example of an early-warning system, which allowed us to work closely with the GAC and through GAC members, especially from Asia, to address issues and concerns raised by governments in a collaborative manner.

DotAsia is a not-for-profit initiative formed as a membership based organization tasked with the operation of the regional TLD registry as a regional online identity for the Internet community in Asia Pacific, with a core mandate to promote Internet development and adoption in Asia Pacific. DotAsia is constituted of 2 types of members: 1. Sponsor Members: ccTLDs in the region; and 2. Co-Sponsor Members: regional Internet organizations. When DotAsia first submitted its proposal in March of 2004, we had 9 members. Today, DotAsia has 29 members (http://www.dot.asia/about/members.html) from across the region. Our well appraised work launching and developing the .ASIA TLD, and our contributions to the Internet community around Asia, we believe, prove that DotAsia was a successful regional TLD initiative for the ICANN gTLD process and for the community in Asia.

Learning from the successful process for DotAsia, we find that the fixed arbitrary numeric percentile mechanism[1] proposed in the current version of the Applicant Guidebook may be inappropriate for

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[1] Module 2, Section 2.2.1.4.2 Geographic Names Requiring Government Support, Point 4 of the current version of the new gTLD Applicant Guidebook: http://www.icann.org/en/topics/new-gtlds/draft-rfp-clean-12nov10-en.pdf

regional initiatives. Each region is different and has their own unique circumstances within their technical and Internet community, culturally, geo-politically and in other aspects. Setting a "one-size-fits-all" approach would seem insensitive to the diversity. What is more important, we believe, is a process that would allow for an applicant of a regional initiative to explain how it would outreach to and continue to engage the respective governments not only before or during the application process but continuing forward post delegation.

Since the ICANN process, through the launch of .ASIA and continuing thenceforth, we believe DotAsia has demonstrated our continued commitment to ensuring an open and inclusive platform. Most importantly, DotAsia continues to proactively maintain an open and collaborative communication channel with the GAC, especially with GAC members in the region through our reserved names and Sunrise policies and processes as well as regular updates during ICANN meetings.

Although not directly related, it may be useful as a reference to note that there are 52 countries and/or territories in Europe[2], and today the European Union has 27 member states[3] (51.9%), while the Euro is used in 17 states[4] (34%). When the European Union was formed in 1992, there were 12 signatories[5] (23%). The observation that seems to become clear is that it may not be about what percentages of countries started or have joined a regional initiative, but whether the initiative has appropriate open doors and enlargement policies[6], demonstrating a continued commitment to inclusiveness, that is most important.

Looking back at the DotAsia process and experience, especially since we are serving the regional community at-large and not within a particular local jurisdiction, we come to also understand that often it is hard for governments to participate until the initiative is actually formed and the TLD is operational. This further explains why we believe an arbitrary numeric "cut-off" percentile is not an appropriate approach. Rather, demonstrated commitment, through a process such as a GAC early-warning system, is most important to ensure that an applicant proposing a regional initiative is the appropriate candidate for such an undertaking.

We understand that the new gTLD process was designed with scalability in mind. Nevertheless, given that there are only 5 macro-regions (and a very limited number of listed sub-regions) a more accommodating process respecting the vast diversity between each region should not pose a problem.

More importantly, we believe that it is appropriate to seek GAC's input for all regional name applications. An early-warning system, followed up by the applicant, that provides the applicant, ICANN and GAC with flexibility to more appropriately address the issues unique for each regional initiative, we believe, form a much better and more comprehensive process.

To more clearly express our thoughts, and to put forward a possible option, we offer the following alternative as a suggestion and input for ICANN's consideration (with reference to: Module 2, Section

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[2] http://unstats.un.org/unsd/methods/m49/m49regin.htm#europe
[3] http://europa.eu/about-eu/member-countries/index_en.htm
[4] http://ec.europa.eu/economy_finance/euro/index_en.htm
[5] The Treaty on European Union (The Maastricht Treaty) http://eur-lex.europa.eu/en/treaties/dat/11992M/htm/11992M.html
[6] http://europa.eu/pol/enlarg/index_en.htm

2.2.1.4.2 Geographic Names Requiring Government Support, Point 4 of the current version of the new gTLD Applicant Guidebook):

4. An application for a string listed as a UNESCO region[7][8] or appearing on the "Composition of macro geographical (continental) regions, geographical sub-regions, and selected economic and other groupings" list.[8][9]

In the case of an application for a string appearing on either of the lists above, ICANN will consult with the Government Advisory Committee as part of its evaluation process. documentation of support will be required from at least 60% of The applicant should present documentation demonstrating the outreach to and correspondence with the respective national governments in the region, and there may be no more than one unmitigated written statement of objection to the application from relevant governments in the region and/or public authorities associated with the continent or the region. Furthermore, the applicant is required to describe and explain how its governance and operations support continued responsiveness to and cooperation with relevant governments in the region and/or public authorities associated with the continent or the region.

Where the 60% rule is applied, and there are common regions on both lists, the regional composition contained in the "composition of macro geographical (continental) regions, geographical sub-regions, and selected economic and other groupings" takes precedence.

IDN ".ASIA" TLDs form a crucial part of the DotAsia initiative. Looking at the IDN ccTLD Fast Track process, where many participants come from Asia, one can appreciate the importance of IDN TLDs in the region. DotAsia is eager to offer to our community a full IDN experience for ".ASIA" domains.

As a not-for-profit organization, since the launch of the .ASIA domain, DotAsia was able to contribute to many meaningful initiatives promoting Internet development and adoption in Asia, including support for the One-Laptop-Per-Child (www.olpc.asia) initiative in Asia, the NetMission Ambassadors program (www.netmission.asia) which brought young volunteers to ICANN, IGF and other Internet governance initiatives, Relief.Asia (www.relief.asia) which has been supporting disaster relief and rebuild efforts around Asia, Information Society Innovations Fund (www.isif.asia), the Asia Pacific regional IGF (www.rigf.asia) and many other community projects.

Furthermore, DotAsia also continues its commitment on outreach and an inclusive approach to membership, as well as regular updates to the GAC and the GAC members in the region. We hope, and

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[7][8] See http://www.unesco.org/new/en/unesco/worldwide/
Africa, Arab States, Asia and the Pacific, Europe and North America and Latin America and the Caribbean
[8][9] See http://unstats.un.org/unsd/methods/m49/m49regin.htm
002 Africa: {014 Eastern Africa, 017 Middle Africa, 015 Northern Africa, 018 Southern Africa, 011 Western Africa}
019 Americas: {419 Latin America and the Caribbean: (029 Caribbean, 013 Central America, 005 South America), 021 Northern America}
142 Asia: {143 Central Asia, 030 Eastern Asia, 034 Southern Asia, 035 South-Eastern Asia, 145 Western Asia}
150 Europe: {151 Eastern Europe, 154 Northern Europe, 039 Southern Europe, 155 Western Europe}
009 Oceania: {053 Australia and New Zealand, 054 Melanesia, 057 Micronesia, 061 Polynesia}

believe, that the DotAsia experience has shown positively that an early-warning mechanism can work, and that a more collaborative approach, between the GAC and the applicant/registry operator, can be successful for the community at-large.

We look very much forward to your favourable response on the matter and the implementation of a full IDN experience, with IDN gTLDs, for the DotAsia community.

Sincerely,

Edmon Chung
Chief Executive Officer
DotAsia Organisation

CC: Kurt Pritz, Senior VP Stakeholder Relations, ICANN
        Heather Dryden, Chair, GAC
        Hubert Schoettner, Federal Ministry of Economics & Technology, Germany (GAC Representative)