

I am submitting these comments on behalf of Domain Dimensions and its clients.

After 36 months of trying to implement the New TLD rollout, the ICANN Board finally must approve the Applicant Guidebook on June 20th, as it committed to do so during the San Francisco meeting, and also approve the start of the Communications Period on that same date.

Delaying its final decision from San Francisco to Singapore was disappointing to those of us who have been working in earnest for over a half a decade on the policy and implementation plan to meet ICANN's mandate to introduce New gTLDs into the root. New TLDs will bring necessary competition to the registry space, as well as greatly benefit consumers through new innovation and improved choice, value and services.

Notwithstanding the disappointment, the delay gave ICANN time to work with the GAC to make some final improvements to the Guidebook. There should be no further delays. The current Guidebook represents a pragmatic, equitable, and accountable implementation plan. Although the current round of comments may result in minor adjustments to the recently changed parts of the Guidebook, there are no significant components of the Guidebook that require change.

Trademark protections in the AG are very strong, far exceeding those in existing gTLDs and ccTLDs and going well beyond community recommendations of the STI and even the recommendations of the trademark specialists in the IRT. As compared to the protections contained in the first Applicant Guidebook, it is clear that the trademark community should be quite proud of what they have accomplished in the current version.

ICANN also has accepted an overwhelming majority of the

recommendations provided by the GAC. In those few cases where the Board decided not to follow GAC advice, there are sound policy reasons for such decisions.

Of course, the policy development process will not end when the Guidebook is approved. It will be available to make changes to the operations of registries based on the experience learned in this round of New TLDs.

I look forward to working with the community as we embark on this next phase of the implementation of ICANN's mandate.

Respectfully submitted,

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