

## **Comment of Comcast/NBCUniversal on the New gTLD Board Committee Consideration of GAC Safeguard Advice**

Comcast/NBCUniversal appreciates the opportunity to comment on the Governmental Advisory Committee's recommendations of for enhanced safeguards in the new gTLD process. As an Internet service provider, intellectual property owner and new gTLD applicant, Comcast/NBCUniversal is deeply invested in ensuring that the new gTLD program expands the global Domain Name System (DNS) in a manner that is safe, secure and reliable. The GAC offers a unique perspective on the potential societal impacts of the new gTLD program throughout the nations and regions of the world, and its contributions throughout the process have been very valuable in highlighting areas for improvement.

In its April 18, 2013 Communiqué, the GAC proposes a detailed series of enhanced safeguards for all new gTLDs, as well as further, specific safeguards for gTLDs that fall under the category of "consumer protection, sensitive strings and regulated markets." These proposed safeguards address longstanding issues such as WHOIS accuracy, DNS abuse, cybersecurity and compliance.

While the recommendations offered in the GAC Communiqué are extensive, and come at a late stage of the new gTLD process, many of the issues they address go to the very heart of the success and stability of the new gTLD program. Advancing the cause of consumer trust in the DNS – particularly in the new gTLD program – is one of ICANN's central responsibilities under the Affirmation of Commitments. Ensuring a stable, safe and secure new gTLD environment is the surest path to securing that trust. Taking the time to integrate these recommendations now – before new gTLDs go live globally – could decrease the likelihood of abuse in the program and increase its chances for success.

Some of the most critical recommendations – including enhanced WHOIS verification and abuse mitigation – have been at least partially addressed in the new proposed RAA and RA. Others, such as strengthened cybersecurity mitigation fall well within ICANN's contractual scope. Indeed several high-profile gTLD applicants have already anticipated the need for enhanced safeguards in their applications, by offering higher levels of protection and enforcement for certain strings.

In addition to the enhanced safeguards for all new gTLDs, the GAC has rightly recognized that there are some categories of gTLDs that raise greater societal, economic and cultural concerns, and as such, should be held to a higher standard of protection. While there can be reasoned debate within the ICANN community over how to identify and define the domains contained within the GAC's "category one" designation, it is more than reasonable that a definition be established, and that new gTLDs meeting that definition be subject to stricter requirements.

Throughout the new gTLD process, the ICANN community has demonstrated that it can move quickly and creatively to address outstanding policy issues. There is no

reason why addressing the GAC's core recommendations should delay the launch of new gTLDs to an extent significant enough to do any harm to the process or its participants.

The GAC's perspective on the real world impacts of DNS policy is unique. It draws directly on the real-world experience of law enforcement, economic regulators and social welfare institutions in every region of the world. When the GAC expresses concern about the potential for abuse in the new gTLD round, and offers common-sense recommendations for addressing those concerns, that advice should not be taken lightly. The GAC's deliberate pace reflects the enormous size and complexity of the constituencies that each GAC member serves.

The GAC and the advice it provides is also a critical component of ICANN's multistakeholder governance model. The GAC provides a direct link between the organization and the hundreds of world governments that are impacted by the management of the DNS. GAC advice has been extremely valuable in advancing the new gTLD process in a manner that ensures safety and stability. The advice contained in the most recent Communiqué continues that tradition, and carries the potential to make the new gTLD process stronger for all stakeholders.

The new gTLD process will make permanent and far-reaching changes to the very nature of the DNS. It is important to understand that the sense of urgency surrounding the speedy completion of that process is almost exclusively the province of ICANN insiders, whereas the outstanding concerns about its implementation is global in nature. The GAC advice offers an opportunity to more thoroughly address those concerns, and is an opportunity that ICANN should seize.