



August 15, 2013

Via Electronic Mail to
comments-gnso-review-15jul13@icann.org

Re: Public Comment of Google Inc. on Postponement of the Generic Names Supporting Organization Review

As a global Internet company whose core business depends on a stable, secure, resilient, and interoperable Internet and as an applicant for new generic top-level domains (gTLDs), Google believes ICANN's multistakeholder model must be continually strengthened if Internet users are to maintain confidence in it. An effective Generic Names Supporting Organization (GNSO) plays a critical role in ensuring that ICANN as an organization functions well. As such, Google looks forward to the next GNSO review with interest.

The review should not be postponed for two principal reasons.

First, much has changed since the last review was launched in 2006.

- In 2006, there were just over 1 billion Internet users.¹ That number has more than doubled in the last seven years.² The rise of mobile broadband, the development of an app economy, and increased use of cloud computing have diversified the ways in which users interact with the Internet. And the Internet has never been more indispensable as a platform for commerce, innovation, information exchange, and cultural activities. If the Internet economy were a national economy, it would rank in the top five, behind only the United States, China, Japan, and India, and behind Germany.³ And by 2016, Boston Consulting Group expects the G-20 Internet economy to generate \$4.2 trillion of value—nearly doubling its current

¹ 2006 Year-End Stats, *Internet World Stats News*, <http://www.internetworldstats.com/pr/edi026.htm#4> (last visited Aug. 14, 2013).

² Internet Usage Statistics -- the Internet Big Picture, *Internet World Stats*, <http://www.internetworldstats.com/stats.htm> (last visited Aug. 14, 2013).

³ Boston Consulting Group, *The \$4.2 Trillion Dollar Opportunity: The Internet Economy in the G-20*, July 2012, at 3, available at <https://valueoftheweb.com>.

contributions. Equally important, the Internet has become a critical medium for the exchange of information and ideas — it plays an increasingly central role in many political campaigns, in research, and in education. Thus, ICANN's ability to act according to its core values of enhancing the operational reliability, security, and global interoperability of the Internet and respecting the creativity, innovation, and flow of information made possible by the Internet is both more multifaceted and more consequential than it was seven years ago: The variety of questions facing the GNSO has the potential to increase significantly, and the GNSO's choices affect more stakeholders and affect those stakeholders more significantly than ever before.

- The expansion of the TLD space has increased the number and variety of stakeholders participating in GNSO policy making. As a result, it is worth examining whether the current model meets the needs of a new generation of stakeholders and allows productive discussion and resolution of emerging issues.

Second, the review has historically taken many years to implement. The previous GNSO review was launched in 2006, and implementation was not substantially complete until 2012. Given that we may face yet another lengthy review process, we encourage the Board and the GNSO community to avoid further delays in commencing the current round.

Google recognizes that ICANN's Accountability and Transparency Review Team (ATRT) process and its Strategic Planning process complement the GNSO review, but they do not supplant it. Both processes have a broader focus and are tailored toward cross-community objectives. Moreover, while ICANN anticipates that both the ATRT review and the Strategic Planning process will be completed by December 2013, there is no guarantee that these processes will be completed on time or that anything meaningful will be implemented as a result. If they are delayed, then the Structural Improvements Committee will be faced with the choice of either delaying GNSO review further (an undesirable outcome) or proceeding with the GNSO review regardless of the outcomes of these two processes (the very circumstance that the Committee's proposal seeks to avoid). Given the growing importance of generic names and the growth of participation in the GNSO, the Structural Improvement should not allow somewhat-related processes to drive the GNSO review timeline.

Accordingly, Google urges that the Structural Improvements Committee commence the GNSO review without delay.

Sincerely,

A handwritten signature in blue ink that reads "Aparna Sridhar". The signature is written in a cursive style with a blue color.

Aparna Sridhar
Policy Counsel
Google Inc.

