

Dear Russ

Thank you for the opportunity to comment on the *Auction Rules for New gTLDs* version 2013-12-12.

Our comments are not specifically related to the Auction Rules as drafted, but go to process and timing of the Auction events.

Timing of Auction Events

Our understanding from the Buenos Aires session on Auctions is that the Auction Events will occur on a Wednesday at UTC 1600.

Firstly, will the Wednesday be narrowed down to the first, second, third or fourth Wednesday or the month for each Auction Event or will this vary?

Secondly, we believe that UTC 1600 seriously disadvantages Bidders from the Asia Pacific Region given that the time is in the early hours of the morning. We provide the following table to demonstrate this point:

Location	Conversion UTC 1600	Daylight saving change over
Singapore	Midnight (SGT)	Midnight (SGT)
Melbourne	3am AEDT	2am (AEST)
Los Angeles	8am PST	9am (PDT)
New York	11am (EST)	Noon (EDT)
Brussels	5pm (CET)	6pm (CEST)
Istanbul	6pm (EET)	7pm (EEST)

We appreciate that in order to conduct an Auction Event, one time is necessary. However, as we believe the table above demonstrates, the UTC 1600 time represents a serious disadvantage to Bidders from parts of the Asia Pacific Region. We believe that, where possible, the timezone of the respective Bidders should be a factor in scheduling Auctions in an attempt to reduce the obvious disadvantage that participating in an Auction at 2am or 3am presents. As ICANN is entitled in its sole discretion to amend the Auction rules for any Auction at any time prior to the Deposit Deadline for that Auction we believe that this discretion could be used to apply some flexibility to scheduling.

Process Outline, timeline and responsibilities

It would be extremely helpful if ICANN could publish a document that outlined the Auction process from the time the Intent to Auction Notification is sent to Qualified Applicants through to ICANN announcing the winners and other details of each Auction Event. Trying to piece this information together from previous webinars and the current Auction Rules and other available documentation is challenging.

Given the Auction process is administratively complicated and has limited flexibility associated with a number of the requirements we believe it is imperative to the success of the Auction process that Qualified Applicants are provided with a document that clearly outlines all the steps in the process. This document does not have to nominate dates, but should represent known timeframes within the process; who is responsible for the various components; and when, how and to whom Qualified Applicants need to provide information.

Thank you again for the opportunity to comment on this issue.

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