

Neustar Inc. has been involved in the domain name industry for many years, and is a contracted party with ICANN as the Registry Operator for both the .biz and .neustar TLDs. As a result of the 2012 new gTLD process we are also responsible for the provision of back end registry services for 334 TLDs.

While we appreciate the detail provided in the Program Implementation Review, we intend to restrict our comments to *Section 2.6 Technical and Operational Capability Evaluation* of the report, and in particular, the suggestion on pg. 79 of the report that a program to accredit registry service providers be explored.

We agree that there would be considerable benefit in accredit registry service providers. Benefits such as those outlined in the report:

- Providing efficiencies for all parties in terms of application preparation and processing;
- Allowing for the thorough review of an registry service provider's full set of services provided across all TLDs;
- Efficient management and auditing capabilities for Registry Agreements as the number of Registry Operators continues to increase; and
- Streamlining processes for registry operators outside of the evaluation process, by allowing services to be pre-certified at the registry service providers level resulting in less testing.

We also note that the Preliminary Issues Report on new gTLD Subsequent Procedures has identified Accreditation Programs as an area for consideration, and in particular, whether accreditation of registry service providers would be desirable.

Given that ICANN staff appear to be suggesting that an accreditation program for registry service providers would be the most efficient manner to proceed for a next round, and that this will also be discussed as part of the PDP WG on New gTLD Subsequent Procedures (anticipating that the GNSO Council will approve the Charter to comments the PDP in the near future), we strongly recommend that the process for developing an Accreditation Program for registry service providers commence immediately, particularly identifying the technical attributes or requirements of such a program. We make this recommendation based on a serious concern that if this work is delayed until the PDP has run its course, unnecessary delays will be incurred in commencing subsequent rounds.

We do not believe that commencing this work now will pre-empt any outcomes of the PDP and in fact could serve as an important input to the discussions. The questions suggested in the Preliminary Issues Report to form the basis of discussion are largely 'policy' questions and are not focussed on the technical attributes of an Accreditation Program.

In order to commence this work, we suggest the creation of a community working group comprising representatives that have the necessary skills and expertise to develop a strawman of the set of technical attributes required for accrediting registry service providers. We also believe that ICANN staff and evaluators involved in the technical related aspects of the new gTLD process would also be well-placed to contribute to this effort. Any output from this working group draft would be subject to public comment to ensure community involvement to the process.