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14 September 2015

Comments to the Preliminary Issue Report on New gTLD Subsequent Procedures

<https://gnso.icann.org/en/issues/new-gtlds/subsequent-procedures-prelim-issue-31aug15-en.pdf>

Cyber Invasion Ltd is a Security, Privacy and Risk Management consultancy based in Dublin, Ireland. We are active in a number of areas in Internet Governance matters. James Gannon is Practise Lead for Security and Privacy and is an individual member of the Non-Commercial Stakeholders Group and the Non-Commercial Users Constituency.

This comment is filed in an individual capacity by James Gannon, and Cyber Invasion Ltd and is not intended to reflect any position of the NCSG or NCUC.

We thank you for the opportunity to comment on the Preliminary Issues Report on New gTLD Subsequent Procedures. We comment staff on an excellent report which captures the overarching themes in a comprehensive manner. The availability and method by which subsequent rounds are processed are of utmost importance to every internet user around the world. We feel that the outcomes of the current round of new gTLDs must be assessed and the lessons learned compiled and acted upon before we move forward with any further rounds.

Of highest concern are the potential impacts on the Security, Stability and Resiliency (SSR) of the DNS that have been introduced via the addition of over 1000 new TLDs to the root. This impact must be evaluated and assessed both now and on a continuing basis during any future policy efforts. Indeed we would go so far as to say that in the absence of certainty in the area of SSR no subsequent rounds should be performed.

We offer a section by section analysis of the Issues Report below in an attempt to provide easily digestible and constructive feedback to the issues report and to the following policy efforts;

Group 1: Overall Process/Support/Outreach Issues

Section	Title	Comment
§4.2.1	Cancelling Subsequent Procedures	<p>We strongly support the text in §1.1.6 of the Applicant Guidebook which states:</p> <p><i>“ICANN has committed to reviewing the effects of the New gTLD Program on the operations of the root zone system after the first application round, and will defer the delegations in a second application round until it is determined that the delegations resulting from the first round did not jeopardize root zone system security or stability.”</i></p> <p>While understanding that there may technically be a policy commitment to subsequent rounds we believe that if there is genuine reason found to cancel subsequent procedures then that must be honored.</p> <p>We do not believe that the assumption from the 2007 Final Report serves as suitable justification for advancing subsequent rounds, but that there must be a combination of factors including community support, technical justification and business drivers to bring about a subsequent or continuous round in future.</p> <p>We support the recommendation that policy efforts be undertaken by the GNSO to examine the viability of subsequent rounds.</p>
§4.2.2	Predictability	<p>Predictability is a cornerstone of any well functioning process. Previous experience has shown that the predictability of the previous round was not to the satisfaction of most stakeholders.</p> <p>We suggest that contrary to some statements that if deemed viable a subsequent round should not be initiated as soon as possible but should be subject to a detailed and deep analysis including previous applicants,</p>

		<p>potential future applicants and the ICANN community as to the process, the supporting documentation and the overall program strategy before any subsequent round is initiated or planned.</p> <p>While accepting that an iterative model may be suitable for some structures if the decision is made that the concept of “rounds” will prevail we suggest that final document versions be produced and final planning documents be devised prior to the announcement of any subsequent round.</p> <p>If a “continuous round” structure is chosen then an iterative model may be better suited, however a structured release schedule and predictable content structure should accompany such as structure for subsequent rounds.</p> <p>Engagement must be garnered from all stakeholders due to the critical nature of future rounds. A cutoff date for engagement must be announced where all stakeholders must have submitted any formal objection, advice or input to future rounds. This is critical to allow careful planning and assessment of positions prior to application for future applicants.</p> <p>We support the recommendation that policy efforts be undertaken by the GNSO to examine the predictability of subsequent rounds.</p>
§4.2.3	Competition, Consumer Trust and Consumer Choice	<p>While we disagree with some of the direct statements made in the PIR with regards to the development of new gTLDs as being a core principal of ICANN’s creation we accept that increasing consumer choice is a noble goal.</p> <p>We note that the outcome of the CCT2 review will have a direct and meaningful impact on the future of any subsequent rounds. With that in mind we suggest that any policy development efforts that take place with regards to this area should take place after the conclusion of the CCT2 review as mandated by the AoC. This is on the opposite timeline to</p>

		<p>that suggested in the PIR, which suggests that policy development efforts in this area may influence the CCT review.</p> <p>We do not support the proposed timeline as defined in the PIR but rather a timeline which places the policy development efforts on this matter after the conclusion of the CCT review.</p> <p>With the above caveat in mind we support the general recommendation that the GNSO consider policy development efforts in this area.</p>
§4.2.4	Community Engagement	<p>We agree with the opening statement of the PIR on this section which notes that:</p> <p><i>“In many ways, this Community Engagement subject for PDP-WG consideration is very much connected to section 4.2.2 on Predictability, as increasing the level of community participation during the early parts and throughout the development lifecycle should allow for better consideration and integration of issues from the various facets of the community prior to the launch of New gTLD Subsequent Procedures. Without robust community engagement, it is conceivable that New gTLD Program requirements could be altered after program launch, which would be a disservice to all those involved with the program, who should be able to rely on pre-published rules and guidelines.”</i></p> <p>Community engagement is a two way process, the community must engage in the policy efforts and the related workload and the wishes and positions of the community must be central to all work undertaken by ICANN staff during the implementation and management of any subsequent rounds. It is critical that all part of the community interface with the policy development process in a meaningful and constructive manner. We have seen recent developments from some stakeholders, who have traditionally found it difficult to provide early engagement, to give informal ‘inputs’ from their</p>

		<p>constituent bodies into complex process development efforts. We suggest that any constructive input is better than a lack of engagement and would support a similar track being taken by stakeholders when necessary in this policy development effort.</p> <p>We agree with the recommendation that this early engagement from all stakeholders does not require a policy development effort but suggest that providing a framework for stakeholders to engage in various forms should be central to any policy development process.</p>
§4.2.5	Applicant Guidebook	<p>We suggest that given that 1930 applications were successfully made during the previous round that the statement in the PIR that:</p> <p><i>“As a result, it is a piece of documentation that represents bottom up, multi stakeholder compromise and as such, is unlikely to be considered perfect by all parties.”</i></p> <p>Is slightly inflammatory to the parties that spent countless hours volunteering to develop the AGB.</p> <p>The applicant guidebook is an appropriate document in our opinion to continue its use into future rounds. We would agree with some suggestions that a more process driven revision should be attempted which would lessen the burden on potential applicants to either acquire or outsource experts in the realistic application of the AGB.</p> <p>We agree that updates or revisions to the AGB would be as a result of policy development efforts rather than the subject of a policy effort in and of itself.</p>
§4.2.6	Clarity of Application Process	<p>We agree with some members of the DG that the previous round was possibly ‘rushed’ for many applicants. Given the diverse set of backgrounds and the small set of people who had a full and in-depth understanding of the</p>

		<p>operational mechanisms by which the AGB would be implemented we suggest that future rounds should follow a more relaxed timeline.</p> <p>Coupling a more relaxed timeline with a better ‘plain english’ application process overview will allow non-technical applicants to evaluate their positions prior to submitting a formal application. We feel that this in turn may increase the diversity and breadth of applicants in any potential future rounds.</p> <p>We suggest hopefully that the systems, security and technical issues related to the application process will not be repeated in potential subsequent rounds.</p> <p>We agree that this topic should not be the subject of policy development efforts but should be examined as part of overall business management of any potential future rounds.</p>
§4.2.7	Applications Assessed in Rounds	<p>We do not have a position on the relative viability of rounds vs continuous applications.</p> <p>We note with caution the following statement with regards to continuing to utilise a rounds based structure:</p> <p>“It can cause a rush of activities around certain milestones, potentially resulting in strains on applicants, service providers, ICANN staff, and ultimately result in missed deadlines, confusion, and overall inefficiency.”</p> <p>We respectfully suggest that given the large volume of revenue generated that ICANN should not be in a position of advocating a position on the basis of lack of resources. While we agree that certain amount of strain will be placed on applicants by continuing to utilise a round based structure ICANN should be in a position to execute a subsequent round regardless of the</p>

		<p>structure chosen. If required additional staff and infrastructure must be put in place. Given the number of failures in the previous round we hope that a comprehensive lessons learned exercise has been completed and trust that such issues will not be revisited in any potential future round.</p> <p>We support an analysis and possible amendment of Recommendation 13 by the GNSO with a view to creating the most efficient system for applicants.</p>
§4.2.8	Accreditation Programs	<p>We would lend our preliminary support to providing for an accreditation process for existing Registry Service Providers (RSP). Given the reality experienced during the previous round with regards to experienced registry operators providing answers we feel that this is inefficient and that a streamlining of certain aspects of technical and security evaluations would be warranted by registry service providers with extensive histories of compliance.</p> <p>We would note that this accreditation should be a high bar to achieve and we hope that if such a system is devised that</p> <p>We would support the recommendation that this possibly be examined and that policy development efforts be undertaken if necessary in this area. We support the example questions that are presented in the PIR.</p>
§4.2.9	Systems	<p>Given the multiple system failures and security issues that have occurred during the previous round we suggest that serious work must be undertaken to ensure that applicants are given a smooth process where their applications and their personal details are processed and held in a reliable and secure manner.</p> <p>We do not necessarily agree that there should be no policy development efforts in this area. A set of standards may be agreed upon as part of the policy development efforts that will bind ICANN to a set of security and</p>

		<p>infrastructure standards. This for many would be a critical set of standards going forward and should be at the core of any policy development efforts regarding the implementation standards for any potential subsequent rounds.</p>
§4.2.10	Application Fees	<p>We agree with the core conclusions of the PIR with regards to the status of the application fee. We believe that no matter how detailed estimate planning is there will always be a variance between the planned costs and the actual costs.</p> <p>We feel that it is important that there is no situation whereby ICANN is forced to fund some part of any subsequent round via alternate methods.</p> <p>We believe that the current application fee while high is not an unattainable level for most applicants to meet given the operational costs that are required to continue the secure, stable and resilient operation of a Top Level Domain.</p> <p>An open and transparent method of cost development should be undertaken to ensure that applicants and the public are aware of the method by which the application fee is derived.</p> <p>We agree with the suggestion that this area does not require a dedicated policy development effort but may be influenced by policy development in other areas.</p>
§4.2.11	Communications	<p>We support the outlines in the PIR which indicate that the communications plan will be an evolution of the framework upon which the previous round was built upon.</p> <p>We suggest that additional outreach to NGOs and enterprises based outside of the United States should be a cornerstone of any such evolution. In our</p>

		<p>experience these two areas did not receive an adequate amount of outreach in the previous round and believe that additional investment in this area will yield a set of applicants with greater diversity and geographical spread than the previous round.</p> <p>As part of any evolution a much clearer value proposition should be elaborated upon and the potential value add to a broad range of potential applicants should be created by ICANN.</p> <p>With regards to ICANN-Applicant communications we agree with the findings in the PIR that the passive style of much of the communications was shown to be unsuited for the applicant pool.</p> <p>We suggest that any future ICANN-Applicant comms plan should be proactive in design and incorporate a more individualistic approach to direct communications</p> <p>We agree with the conclusion that this area may not require any specific policy development efforts but may be influenced by policy development in other related areas.</p>
§4.2.12	Applications Queueing	<p>Given the failure of certain aspects of the application queueing system in the previous round we find it incumbent upon ICANN to devise a more efficient, scalable and appropriate system to process subsequent rounds.</p> <p>We concur with the recommendation that an alternative application processing methodology must be considered before the announcement of any potential future rounds. Indeed we would suggest that this be a requirement as a gating step before any future rounds be announced.</p> <p>We agree that a policy development effort should take place with regards to this issue. We also add that we feel that this should be an area of reflection</p>

		<p>in conjunction with our recommendations on §4.2.9 regarding systems suitability and scalability to avoid a repeat of certain unwanted aspects of the previous round.</p>
§4.2.13	Application Submission Period	<p>We believe that a discussion must take place on the application submission window that will be available to applicants in potential future rounds. We feel that a longer window would be of value to most if not all applicants who may have a number of obstacles to application confirmation and submission.</p> <p>We feel that an extended window will increase the variety and diversity of applications received in any potential subsequent round. We feel that this will also reduce the reliance on members of the ICANN community who have deep level expert knowledge on the application and operationalisation of any future revision of the AGB and will promote a fairer marketplace for application.</p> <p>We support strengthening the recommendation in the PIR to positively affirm that a policy development effort should be undertaken to examine this area.</p>
§4.2.14	Support for Applicants from Developing Regions	<p>We are supportive of the work of the JAS, ASP and more broadly of increasing the diversity of applicants from developing regions.</p> <p>We agree with the PIR that the ASP was underutilised in the previous round. We suggest that some analysis should be undertaken by ICANN to determine the cause of such underutilisation.</p> <p>On the topic of financial assistance, we agree with continuing the option of the reduced application under the ASP. We note that a deciding factor for many potential applications from developing regions may not be the application fee to ICANN but rather the ongoing operations costs associated with running a TLD. We understand from some investigational discussions on our part that some potential applications would have found themselves</p>

		<p>unable to meet the financial obligations required to either independently run a backend registry or to contract out to a 3rd party for such a service. We find this situation to be highly unfortunate. However we would refer back to our core concern of SSR for any potential future rounds and caution against providing assistance on the application phase to potential applicants who may not have the financial resources to operate a TLD.</p> <p>At no stage can the SSR of the DNS be placed at risk due to the goal of increasing diversity.</p> <p>We agree with the recommendation that the GNSO examine the ASP and the criteria as part of its policy development efforts.</p>
§4.2.15	Different TLD Types	<p>We agree with the findings in the PIR that a ‘one size fits all’ application process does not reflect the reality in the marketplace of potential applicants.</p> <p>However we strongly suggest that an over fragmentation of the application process will be a destabilising influence in what is already a complex policy and implementation space.</p> <p>We agree that policy development efforts are required in this area and express our hope that future rounds will provide a clearer application process that is easy to follow with clear delineations between application categories.</p>
§4.2.16	Application Submission Limits	<p>We believe that there should not be any limit placed on the number of applications permitted per applicant.</p> <p>We do not agree with the suggestion of the DG to have a dedicated round for any application category as this may decrease CCT in the marketplace and encourage shill applications in order to gain a competitive advantage.</p>

		<p>Given our individual positions stated above we agree that this issue should be examined as part of the policy development efforts in the GNSO.</p>
§4.2.17	Variable Fees	<p>As noted in our recommendations to §4.1.10 we believe that the existing application fee is not an unreasonable barrier to entry given the ongoing operational costs in running a secure and stable TLD.</p> <p>We believe that if a variable application fee is to be considered it must be on the basis that the application will present a more streamlined application to process. We would support a reduced application fee if the applicant is using an accredited RSP for example as this would reduce the workload and thus the cost recovery requirements associated with the application.</p> <p>We believe that any variability in application fees should follow a simple easy to understand reduction structure that potential applicants can understand and present to non technical leadership and thus increase the potential value add that submitting an application will bring to the applicant's organisation.</p> <p>We agree that the application of a variable fee structure would be as a result of the outcomes of policy development efforts in other areas rather than the subject of policy development efforts in its own right.</p>
Group 2: Legal/Regulatory Issues		
§4.3.1	Reserved Names List	<p>We agree with the findings of the PIR that the issue of Reserved Names still requires further development.</p> <p>While understanding the position of some stakeholders with regards to the reserved names list we urge all involved parties to come to a clear and defined method of determining the reserved status of a name or to develop a</p>

		<p>final and definitive list for each potential subsequent round.</p> <p>We believe that in order to minimise the complexity of some contentious applications a process defining how such a list will be generated and managed should be done in advance of the announcement of any potential subsequent rounds.</p> <p>We strongly agree with the recommendation that the GNSO, the GAC and the ccNSO work collaboratively to come to an agreement on such a procedure while including the work of the CCWG on the use of Country/Territory Names as TLDs in their deliberations.</p> <p>We believe that depending on the outcome of such discussions and deliberations policy development efforts may or may not be required to integrate a potential new process into any potential subsequent rounds.</p>
§4.3.2	Base Contract	<p>We agree with the findings of the PIR with regards to the viability of a base contract for all potential applicants. In order to assess the viability of a potential application it is critical that a base contract will be made available at a commercially reasonable time prior to the opening of any potential subsequent rounds.</p> <p>We believe that the set of potential questions that the PIR includes with regards to various issues that presented themselves in the previous round is a good starting point to assess policy development efforts required for any potential subsequent round.</p> <p>We agree that policy development will be required with regards to the base contract going forward into potential future rounds.</p>
§4.3.3	Registrant Protections	<p>As stated in our preamble the maintaining of the SSR of the DNS must be the core consideration of any potential rounds.</p>

		<p>We believe that at all levels critical technical and security considerations and standards should be extended to all applicants and that the form or category in which the applicant has applied should not be a factor in determining if a new operator is sufficiently qualified to operate a TLD.</p> <p>One only has to look at the prevalence of BGP route leaks and general misconfigurations to see the potential impact of what may at first glance appear to be minor mistakes or lapses in standards application.</p> <p>While recognising that some .brand applicants may not intend to have registrations in the traditional sense we believe that this is not a valid criteria for blanket exemption from registrant protection mechanisms. We suggest that a separate standard may be developed for exclusive, closed registries due to the nature of their usage.</p> <p>We proffer an example that an internal EBERO style disaster recovery plan may be offered in place of an external EBERO for an exclusive, closed registry, however such plans should be held to a similar high standard as an open generic registry.</p> <p>We would support an initial investigative approach with prior applicants who have suggested such an approach to prepare a discussion paper for the GNSO on this matter.</p> <p>We would support the examination of policy development efforts in this area once a broad set of inputs has been gathered on the matter.</p>
§4.3.4	Compliance	<p>We believe that given the early state of registry compliance that there is not enough data to support the inclusion or exclusion of compliance from potential policy development efforts.</p>

		<p>We believe that the PIR may be premature in suggesting that compliance is a topic that may not require policy development efforts.</p>
§4.3.5	Registrar Non-Discrimination	<p>We agree that the inclusion of Spec 13 will need to be formalised and conflicting referenced will need to be removed from the AGB where required.</p> <p>We do not hold a position on vertical integration at this time, we see no reason on the basis of SSR to prevent cross ownership, particularly in cases of niche applicants and .brand style applications.</p> <p>We support the recommendation that policy development efforts be undertaken to resolve the conflict between existing policy positions and Specification 13.</p>
§4.3.6	TLD Rollout	<p>We would support the production of a quantitative analysis of the time periods that previous applicants have required to operationalise their TLDs.</p> <p>We believe that the timeframe required of potential applicants in any potential subsequent rounds must be based on factual data from the previous round.</p> <p>We would support the recommendation that policy development efforts are undertaken on the basis of the successful production of the above document to use as a basis for such deliberations.</p>
§4.3.7	Second Level Rights Protection Mechanisms	<p>We recognise the importance of Rights Protection Mechanisms at the second level for many if not all interested stakeholders.</p> <p>We note that the questions prepared in the PIR are a good basis to begin deliberation on this critical matter. We suggest that the outcome of the potential PDP on RPMs will be a deciding factor in whether dedicated policy development efforts are required with regards to any potential subsequent rounds.</p>

§4.3.8	Registry/Registrar Standardisation	<p>We believe that the contents of the RRA are beyond the scope of the potential GNSO PDP but agree that this should be the subject of efforts between the contracted parties facilitated by ICANN if necessary to ensure that a vibrant marketplace for registrants is but around any potential subsequent round.</p>
§4.3.9	Global Public Interest	<p>It is our understanding that efforts are ongoing between ICANN and the community to begin the herculean effort of defining the ‘Global Public Interest’ as part of ICANN’s strategic plan.</p> <p>We suggest that the outcome of this work should be examined in conjunction with other input materials when determining if this area should be the subject of a policy development effort.</p>
§4.3.10	IGO/INGO Protections	<p>We agree with the recommendation that the work of the existing PDPs in this area should alleviate any requirement that a dedicated policy development effort be required to address IGO/INGO protections.</p> <p>We note that it will be important to respect the outcomes of existing policy development efforts and not attempt to rewrite existing policy on IGO/INGO protections through any potential subsequent round development efforts.</p>
§4.3.11	Closed Generics	<p>We believe that ‘closed generics’ have no place in a vibrant ecosystem of new gTLDs and would not support any efforts that would allow their proliferation in subsequent rounds.</p> <p>We would support policy development efforts on this issue, given the policy positions of many GNSO stakeholders on this matter we would hope that this issue could be resolved in a relatively short timeframe.</p>
Group 3: String Contention/Objections and Disputes		

§4.4.1	New gTLD Application Freedom of Expression	<p>We support the position of the Council of Europe with regards to the assessment of Human Rights being integrated into any potential subsequent rounds.</p> <p>We agree with the assertion that the potential content must continue to be considered out of scope for any gTLD application review process and that international norms in Freedom of Expression must be adhered to when considering any future applications.</p> <p>We support recommendations 2-4 of the COE as follows:</p> <ul style="list-style-type: none"> <i>2. ICANN should define public interest objectives;</i> <i>3. ICANN should improve the human rights expertise and early engagement in the GAC;</i> <i>4. Develop an early engagement mechanism for the safeguard of human rights</i> <p>We note the formation of the ‘<i>Cross Community Working Party on ICANN's Corporate and Social Responsibility to Respect Human Rights</i>’ and commend the Non-Commercial Stakeholders Group for taking initiative on this critical item. We would hope that the CCWP will provide valuable outputs in time for consideration prior to any potential subsequent rounds.</p> <p>We support the inclusion of a potential Human Rights Impact analysis into the application evaluation process as envisioned by the Cross Community Working Group on Enhancing ICANN Accountability.</p>
§4.4.2	String Similarity	<p>We believe that the working methods for the existing String Similarity Panel may not be sufficient given some academic analysis of the outcome of the .hotels/.hoteis IRP.</p> <p>We suggest that a reworking of the SSP should be undertaken as part of any</p>

		<p>policy development efforts, such a rework should be broad in nature examining the working methods, timelines and objection procedures.</p> <p>With respect to auctions while we feel that this is a topic for consideration we feel that usage mechanisms of last resort should be minimised and that effort should be put into ensuring that process improvements and alternative resolution methods are more completely explored before resorting to such mechanisms.</p>
§4.4.3	Objections	<p>We agree with the opinions of many of the DG that the objections procedure represented in many cases an unnecessarily high barrier to entry for many genuine objections.</p> <p>We believe that the method of objection for some stakeholders should be better defined in order to increase the predictability and viability of any potential subsequent round.</p> <p>We agree that this issue will require policy development efforts, we agree with the set of initial questions and suggest that the method and standard of objection for the GAC be reexamined prior to any potential subsequent round.</p>
§4.4.4	Accountability Mechanisms	<p>We note that comprehensive and far reaching reforms of Ican's accountability mechanisms are currently underway via the CCWG-Accountability.</p> <p>We believe that it would be premature to make any comment on this matter until the work of the CCWG-Accountability is complete and ratified.</p>
§4.4.5	Community Applications	<p>We believe that the process for CPE evaluations required an overhaul prior to any potential subsequent rounds. On the basis of the evidence presented in multiple IRP and accountability engagements we believe that the current system may not be fit for purpose and requires reevaluation.</p>

		<p>We support the recommendation that policy development efforts must be undertaken on this issue prior to any potential subsequent rounds.</p>
<p>Group 4: Internationalised Domain Names</p>		
§4.5.1	<p>Internationalised Domain Names and Universal Acceptance</p>	<p>Universal Acceptance in general is an issue which concerns us, and by extension the acceptance of IDN's is a critical subset of the overarching UA problem set.</p> <p>We note a large number of UA, LGR and related efforts are underway at this time and support the efforts that ICANN has made of late in this space. Additionally we note that the UASG will be a critical set of stakeholders in any and all US and IDN acceptance work resulting out of any policy development efforts.</p> <p>We agree with the recommendation that further policy development and guidance may be required in this area prior to to the announcement of any potential subsequent rounds.</p>
<p>Group 5: Technical Operations</p>		
§4.6.1	<p>Security and Stability</p>	<p>As stated in our preamble we believe that SSR issues should be at the core of any potential considerations of subsequent future rounds.</p> <p>We suggest that a report be commissioned by the Board from the SSAC on potential future name collision issues alongside a DNS stability review.</p> <p>While not considered in the PIR we would additionally suggest that the</p>

		<p>security and trust criteria for RSP's offering EBERO services be reconsidered given some recent developments.</p> <p>We suggest that the current EBERO standards for open generics may be considered overly narrow in their assessment of a RSP's ability to provide such a service which is a critical SSR measure.</p> <p>We suggest that if an EBERO has displayed critical security failings in their general business practices then it may not be appropriate for such a provider to continue as an EBERO and that a more holistic compliance requirement may be needed to account for such failings.</p> <p>We would support the recommendation that the evaluation criteria and other aspects related to SSR issues being examined as part of any policy development efforts prior to the announcement of any potential subsequent rounds.</p>
§4.6.2	Applicant Reviews: Technical/Operational and Financial	<p>We note that if an accreditation system for RSP's is developed the issues identified around clarifying questions may be largely resolved for the majority of potential applicants as a deep security evaluation would be a necessary gated requirement to accredited status.</p> <p>We note that while not examined in the PIR many applicants in the previous round found some of the financial instruments required to be overly onerous and required much multilateral negotiations between the applicant, their financial institutions and ICANN. Such procedural issues must be resolved prior to the announcement of any potential future rounds.</p>
§4.6.3	Name Collisions	<p>We note the SSACs fantastic work in the area of name collisions as being the cornerstone of any future work on this critical stability mechanism.</p> <p>We would suggest that the GNSO defer to SSAC guidance on this area</p>

		given their expertise in such matters. If the SSACs recommends that policy development efforts be undertaken in this area we would support such a call.

Work Processes

We note that the foundational work on the viability of a subsequent round or rounds needs to be completed prior to any any policy development.

We would agree in principle to the grouping of subjects that can be assessed in parallel, however we caution our support on the basis that additional parallel workloads will be extremely taking on community volunteers and if such a working method was to be utilised it is critical that volunteer burnout is addressed and that the community is empowered to set the schedule for any such working method without undue pressure to meet artificial deadlines that are set by ICANN staff.

We would suggest that a matrix of related efforts and their timelines would be a valuable work product for staff to produce for the community to understand the impending workload related to any potential policy development efforts.

As noted above we would be amenable to the concept of parallelisation but such an approach must be cautioned with a realistic timeline for the community members who will be driving these policy development efforts.

Conclusion

We thank staff for their work on this critical Issues Report, we believe that it accurately captures much of the current ecosystem around the potential for future gTLD rounds.

We look forward to engaging with the community, staff and potential applicants for an future round to ensure that the principals of consumer trust and choice, and security stability and resilience of the DNS root are held core to any future policy development efforts.

Respectfully submitted,

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