

To: ICANN  
My Comments re:  
[Proposed Renewal of .CAT Sponsored TLD Registry Agreement](#)  
[Proposed Renewal of .PRO Unsponsored Registry Agreement](#)

This is nothing less than an underhanded attempt by ICANN staff to bypass ICANN multistakeholder policy-making processes to apply [new gTLDs URS policy against domain name registrants of incumbent, or “legacy,” gTLDs--.CAT, .PRO, .TRAVEL \(and by implication, all legacy gTLDs--.COM, .NET, .ORG, etc.\)](#)--which in the case of .TRAVEL has already received an overwhelming [negative response in comments posted](#), and I incorporate by reference herein my comment on .TRAVEL (in its entirety) posted here: <http://forum.icann.org/lists/comments-travel-renewal-12may15/msg00004.html>.

"Desire for uniformity of the Registry Agreement" is a poor excuse for ICANN staff attempting to bypass stakeholder policy-making processes, and make "uniform" that which was specifically made not to be uniform, not to mention the variations and lack of uniformity within just the [new gTLD registry agreements](#). In addition, it is hardly "voluntary" when ICANN staff prepares and present a Registry Agreement with the URS included, to a renewing **legacy gTLD** registry operator. The "affected parties" are **primarily domain name registrants**, and ICANN staff has no clue about domain name registrants since there is **no** domain name registrants' stakeholder group within ICANN. ICANN officers and staff tend to forget that [new gTLDs](#) are an "experiment" and **new gTLDs total less than 2% of all domain names registered globally**. See also: [Domain Mondo | domainmondo.com: ICANN is NOT a new gTLDs Marketing Agency: ICANN 53 Review, Part 3.](#)

ICANN staff have apparently decided to start making ICANN policy by applying a URS policy **intended only for new gTLDs against all registrants of legacy or incumbent gTLD domain names**. There are **many, many reasons not** to register **new gTLD domain names—Universal Acceptance (new gTLD domain names failing to work as expected across the internet” or “break stuff”), exorbitant or extortionate pricing schemes, and the defective URS policy—which is why I am not a registrant of any new gTLD domain names.**

Therefore, the .PRO. .CAT, and .TRAVEL and all other legacy gTLDs renewal RAs should be referred for Board consideration only after Specification 7/URS has been removed from the agreement, along with all other provisions derived from the **new gTLD RA** which may have been inserted by ICANN staff that are not established consensus policies applicable to legacy or incumbent gTLDs.

Respectfully submitted,  
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