

To: ICANN

My Comments re:

[Proposed Renewal of .CAT Sponsored TLD Registry Agreement](#)

[Proposed Renewal of .PRO Un-sponsored 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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