

## **Comment of Comcast/NBCUniversal On the Proposed 2013 Registrar Accreditation Agreement**

Comcast/NBCUniversal appreciates the opportunity to comment on the progress toward finalizing a new registrar accreditation agreement. As an Internet company, intellectual property owner and applicant in the new gTLD process, Comcast/NBCUniversal takes particular interest in the RAA. Registrars are the direct points of contact for hundreds of millions of domain name registrants worldwide, and as such, are uniquely situated to improve the safety and stability of the Domain Name System by enforcing baseline codes of conduct for users.

Comcast/NBCUniversal's initial review of the progress on the 2013 RAA reaffirms our belief that the proposed contract represents an important evolutionary step forward from the 2009 contract. Comcast/NBCUniversal commends ICANN and the registrar community for embracing the 12 recommended improvements proposed by the law enforcement community, and for working in good faith to implement all of them in the new contract.

Taken together, we believe the 12 law enforcement-recommended improvements have the potential to dramatically increase registrant compliance and data accuracy throughout the DNS. That the negotiating teams have reached final agreement on 11 of the 12 provisions, and agreement in principle on the one outstanding provision, is a testament to the spirit of hard work and compromise that has characterized the negotiating process.

While the negotiated interpretations of the law enforcement recommendations are not as strong as what Comcast/NBCUniversal has sought, the current iteration of the 2013 RAA still represents a major step forward for the safety, stability and reliability of the DNS. We strongly urge ICANN and the registrars to continue in the spirit of compromise to bring the negotiation process to a successful close so that the 2013 RAA can be completed before the next ICANN meeting in Beijing.

While the draft 2013 RAA represents a strong improvement over previous contracts, its true effectiveness will depend on two factors:

1. Fast, widespread implementation, and
2. Consistent, rigorous enforcement

The sooner the RAA is widely deployed among the majority of registrars, the sooner its benefits will take effect throughout the global DNS eco-system. For this reason, Comcast/NBCU continues to strongly support the requirement – contained in Section 1 of Public Interest Commitments Specification of the Revised New gTLD Registry Agreement – that all new gTLD operators engage exclusively with registrars that have signed the 2013 RAA.

As we have stated previously, the RAA clause in Section I makes sense because it provides a powerful, positive incentive for registrars to adopt the new RAA. If it is codified in the final Registry Agreement, we believe that the vast majority of registrars will sign the new RAA in order to participate in the new gTLD program at launch, meaning that the RAA protections will apply in the broadest possible sense, at the earliest possible moment in the new gTLD process. In turn, this means that the new RAA will help shape the new gTLD marketplace, rather than be grafted onto it after it is already formed.

Comcast/NBCUniversal also strongly supports ICANN President Fadi Chehadé's publicly stated position that the RAA must be finalized before new gTLDs are approved. The RAA represents one of the most important checks against DNS abuse in what will be a massively expanded Internet addressing system. Beginning that expansion before the RAA is firmly in place dramatically increases the risk of abuse and exploitation of the new gTLD program. Because the ongoing success of the new gTLD program will be determined, in large measure, by the effectiveness and stability of its launch, it is critical that all appropriate protections be in place before that process begins.

## **Conclusion**

Comcast/NBCUniversal again thanks ICANN for the opportunity to comment on this critical matter. ICANN and the registrar community are nearing completion of a process that will make the DNS safer and stronger, establishing a solid foundation for the expansion of the Internet addressing system globally. We commend the negotiating teams for their hard work in strengthening this critical contractual agreement. But the 2013 RAA can only make a difference once it is completed, ubiquitously adopted and rigorously enforced. It is essential that the parties to the RAA negotiating process not allow the perfect to be the enemy of the good. We urge the negotiating parties to recommit to the process of consensus and compromise that has taken them this far, and finalize this effort that is so essential to the future of the DNS.