Dear ICANN:

Re: Proposed Renewal of .TRAVEL Sponsored TLD Registry Agreement issued for public comment on May 12, 2015.

This is written in opposition to the inclusion of a modified version of the new gTLD rights protection mechanisms in Specification 7 of the proposed RA, especially Uniform Rapid Suspension (URS). ICANN should not further damage nor contaminate the domain name ecosystem by imposing aspects of its ill-conceived, misbegotten, and "horribly implemented" new gTLDs program upon any of the incumbent or "legacy" gTLDs (generic top-level domains). If anything, ICANN should be directing all of its time and resources to remediation of its defective, unpredictable, and unfair UDRP program.

All the new gTLD RPMs were implementation details of the new gTLD program and are not ICANN consensus policies applicable to all registries and registrars. The URS can become a consensus policy only after a full policy development process (PDP) engaged in by the entire ICANN community of stakeholders. The ICANN community has not even received the new gTLD RPM Issues Report that staff will be providing to the GNSO in September 2015. Imposing URS on an incumbent gTLD via the contracting process is an absolutely unacceptable staff intervention into the policymaking process. Approval of this draft contract would constitute top-down, staff-driven policymaking in direct violation of ICANN's stated commitment to the bottom-up, private sector led policy development process. Furthermore, the public comment notice posted by ICANN staff is defective in its failure to even mention the URS or its imposition in the .TRAVEL sponsored TLD Registry Agreement.

Therefore, the .Travel renewal RA 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 that are not established consensus policies applicable to incumbent gTLDs.

Sincerely,

John Poole
Domain Name Registrant *and*
Editor, Domain Mondo *and*
Managing Director, Expri Communications LLC