

## **CRA Report: Revisiting Vertical Separation of Registries and Registrars Summary & Analysis of Comments**

**12 January 2009**

ICANN staff has prepared this summary and analysis of comments received on the CRA Report titled "Revisiting Vertical Separation of Registries and Registrars." The comment period ran from 24 October to 23 December 2008. 32 comments were received during the comment period. ICANN also conducted two face-to-face consultation sessions with remote participation, one on 11 December in Washington DC, and a second on 19 December in Marina del Rey, California. The public comments on this forum are archived at <http://forum.icann.org/lists/crai-report/>.

### **CRA Report**

Charles River Associates (CRA) prepared a report for ICANN on Revisiting Vertical Separation of Registrars and Registries. The Report is based on economics expertise, research and interviews of various stakeholders between February and June 2008.

ICANN's policies regarding the relationship between registries and registrars have evolved over time. The current gTLD registry agreements prohibit registries from acquiring more than 15% of a registrar (since the 2001 agreements). That has the effect of prohibiting any cross-ownership.

ICANN's founding is connected to a Core Value of fostering competition in the registry and registrar functions. Adding competition at the retail level for domain names is one of ICANN's first major accomplishments.

The paper indicates that economic theory and practical experience in other industries have shown that mandating ownership separation where vertical integration is possible can sometimes hinder, rather than foster, effective market competition.

The CRA Report recommends lifting the current restriction on vertical separation: perhaps in multiple steps process that eases the restrictions. To start discussion, CRA suggested two candidate models for gradual lifting of restrictions: a single-organization TLDs; a hybrid model where a registry would be allowed to own a registrar, where the registrar did not serve the registry that it owns (or owns it). These models are meant to inform discussion. CRA's report suggests that, for registries operating under price caps, the arguments in favor of vertical separation and equal access are less clear-cut.

The Report sets out the history of the registry-registrar market, from pre-1999, to the 2001 VeriSign Registry Agreement, to the introduction of new gTLDs in 2005, and usage of registrars in the marketplace today.

CRA notes that ownership separation reduces the risk of discrimination as required by the equal access provision. CRA also notes that some of the proposed new gTLD models would be incompatible with vertical separation (e.g., privately held or ".brand" type TLDs are mentioned).

The report suggests that vertical integration could promote the growth of new gTLDs, facilitate registry innovation, and eliminating the 15% restriction may encourage registrars to acquire registries.

## Public Comments

**Amadeu Abril I Abril** – Amadeu supports maintaining the current structural separation but is also proposing a hybrid model. He says that some registrars serve as backend registry operators today (like CORE) and they should be permitted to do so and operate a registry as long as they do not sell registrations in the TLD they are managing.

He finds the recommendation on single-owner TLDs difficult to implement.

He also suggests “So perhaps ICANN could consider allowing registries managing a TLD under, say, 10,000 names, to act for such time as registrar (NOT as single registrar).” See <http://forum.icann.org/lists/crai-report/msg00000.html>, updated at <http://forum.icann.org/lists/crai-report/msg00011.html>.

**Liana Ye** – Title of comment is “vertical separation is unavoidable and is a must to achieve transparency”. She suggests that legal separation is important and there should be a requirement that at least 50% of the directors [for a registry or registrar] cannot be the same.

She also suggests “Allow registrar to operate both as registry and registrar to a certain point before they have to separate into two entities to encourage start-up operation without price cap.”

Finally, she suggests that registrars could serve as a backup registry operator for a registry in event of emergency, political upset or natural disaster. This would be based on time zones and geographic regions. See <http://forum.icann.org/lists/crai-report/msg00001.html>.

**Vittorio Bertola** – Vittorio states that the report has good points but focuses only on two models, 1) “classical selling of registrations for profit” and 2) single corporate registration. He states that the report fails to consider TLDs aimed at small communities or not-for-profit.

He believes there is a risk for geographically defined communities or IDNs of attracting enough registrar support for the TLD to be viable. Vittorio is encouraging the study to include other models, such as:

- 1) TLD with less than 20,000 registrations or gives away domain names for free, then registry can self-manage.
- 2) A TLD not under #1 above but has less than 100,000 registrations or less than 4 accredited registrars willing to sell, then registry can choose to act as registrar but is required to accept and serve any accredited registrar willing to sell the TLD.
- 3) For TLDs where names are not given away for free, more than 100,000 registrations, and at least 4 accredited registrars willing to sell, then present policy of separation applies and registry cannot sell as registrar. See <http://forum.icann.org/lists/crai-report/msg00006.html>.

**Eric Brunner-Williams** – Eric submitted six comments. His first raised 5 points:

1. String space is valuable, and single-organization entities do not require string space.
2. IANA publishes globally accessible public name spaces, & single-organization entities do not require globally accessible public name spaces.
3. Single-organization entities do not provide more value than a bulk registrar margin.

4. Single-organization entities are not compatible with RFC 1591 (Domain Name System Structure and Delegation).

5. Single-organization entities operate in a pre-1999 market.

Eric writes that the single-organization model “is predicated, in part, on the margin between the price capped base registry price and the retail price being “inefficient”...and is predicated on the ICANN per-domain fee being “inefficient”.” See <http://forum.icann.org/lists/crai-report/msg00008.html>.

On his second comment, he questions the \$75,000 annual fee as too high for most brand owners to consider defensive registrations of TLDs, but possible for a large trade union and its membership. See <http://forum.icann.org/lists/crai-report/msg00009.html>.

He notes that the single-organization model is open to gaming. “So I think there are ways to make a great deal of money gaming the single-registrant-with-flat-fee model and we shouldn't assume the CRAI-1 model is just corporations giving email to employees or managing product CRM.”

Eric's third comment focused on the hybrid-integrated model. He says the model is attractive as it does not attempt to prevent registrars from operating registries and “it prevents preferential dealing between registrar and registry functional elements within a single entity.” He questions what happens if a registry offers domain names for free as part of a bundled service offering. See <http://forum.icann.org/lists/crai-report/msg00010.html>.

The fourth comment was made as a follow-up on the DC consultation from 11 December 2008. He asked:

- 1) What are the issues, for and against, with the “single registrant” model?
- 2) What exceptions to the rules developed around registrations for legacy gTLDs should be considered, and why, based on the experience with the sponsored TLDs, for community-based applications in 2009?
- 3) What exceptions should be considered for cross-ownership between registries and registrars?
- 4) What contractual terms should be modified if changes in the registry-registrar relationship are made?

He also noted there is an issue with registration requirements and registrant rights in a case where a broadband provider operates a “single registrant” model TLD. See <http://forum.icann.org/lists/crai-report/msg00016.html>.

His other two comments are located at <http://forum.icann.org/lists/crai-report/msg00022.html> and <http://forum.icann.org/lists/crai-report/msg00031.html>.

**Michael Palage** – Palage states that the report's “recommendation for relaxing the existing restrictions are vague/ambiguous and without further clarification will impede the pending new gTLD process.” He suggests that ICANN consider several potentially ambiguous scenarios not covered in the CRA Report.

He writes “there should be a continued strong presumption in favor of this distribution model in the near foreseeable future. However, this presumption should be a rebuttable one in which a

registry can demonstrate how deviation/relaxation of the existing separations requirements will not negatively impact consumer choice, innovation, and competition.”

Palage suggests that an option would be to permit a “registry to provide domain name registration services direct to registrants provided that registration volumes did not exceed a certain threshold level, i.e. 50,000.”

His other suggestion is that “ICANN staff in consultation with the community, including potential applicants, create a list of hypotheticals that should be provided to CRAI for clarification as to whether the proposed registry business model qualifies for a relaxation of the existing registry/registrar requirement.” See <http://forum.icann.org/lists/crai-report/msg00012.html>.

**Steve Metalitz (on behalf of IPC)** – The comment begins by stating that ICANN has not made clear why the CRA Report was requested in the first instance. The IPC urges ICANN to provide its reasoning and assumptions underlying the request to CRA to conduct the report. They also note that the comprehensive economic study still has not been done and would be valuable for a number of ICANN initiatives. The IPC is asking for a status update on that study.

The IPC notes that some registrars are large domain name holders. “Because several registrars own vast domain portfolios, the equal access and vertical separation requirements also have the positive effect of preventing particular *registrants* from having privileged access to domains in particular registries. Relaxing the requirements could inhibit competition in the market for domain names.”

“Therefore, preventing registrants from gaining privileged access to particular registries, which was not mentioned by the Report, is a compelling reason to preserve the vertical separation requirements. This will remain true at least until such time as ICANN adopts a consensus policy limiting registrar warehousing of domain registrations”.

*“Vertical Separation in Registries under Price Caps*

The Report is correct that relaxing the vertical separation requirement for registries operating under a price cap is undesirable, and will remain so for at least as long as those registries, particularly .com, account for such a disproportionate volume of current registrations.”

On single-owner TLDs, the IPC notes this is theoretically-possible but the devil is in the details. They do not understand why a gTLD operated as a money-making venture should be excluded from the single-owner model. Owners of a collective mark may want to register a gTLD and sell second-level registrations to members. The same may be true of trade associations or franchisors. They note that “the Report’s description of the single-owner model should have made clear what gTLDs should not qualify for the single-owner model.”

The IPC calls the hybrid model proposed in the report deeply flawed and should not be given serious consideration. If not for vertical separation, ICANN may have to take on more monitoring and enforcing compliance. See <http://forum.icann.org/lists/crai-report/msg00013.html>.

**Antony Van Couvering** - Antony writes “When all the world was cornflakes and cheerios (.COM and .NET), it made sense that there shouldn’t be a monopoly provider. Now that we’re about to have everything from frosted flakes to granola to muesli to coco-krispies (all the new flavors of TLDs), I’m not sure that it makes that much sense any more.”

He provides scenarios involving 3 potential application types 1) small cultural/linguistic/

geographic TLD, 2) restricted TLD with qualification procedures, & 3) a community-based IDN TLD with strict registration criteria. See <http://forum.icann.org/lists/crai-report/msg00014.html>.

He believes that some examples might require a dedicated registrar or (better) a registry that can sell directly to the public.

“Probably the best solution, and where ICANN will end up eventually, is that .com, .net, and the other gTLDs that have found acceptance among registrars, should retain the registry-registrar split. Others, particularly those labeled as “community” TLDs by ICANN, should be able to choose to use the ICANN registrar channel or not. Failing that, either registrars need to agree to offer all new TLDs according to the needs of that registry (highly unlikely), or the rule that a registry cannot own more than 15% of a registrar should be abolished.”

**Jon Nevett on behalf of Network Solutions** – Nevett provided several suggestions, including a model. See <http://forum.icann.org/lists/crai-report/msg00017.html>. Jon’s basic points are as follows:

1. Requirements between registries and registrars must ensure the continued promotion of competition.

Network Solutions supports the introduction of new gTLDs. If there are to be any changes to the structural requirements between registries and registrars, these changes should not undermine competition.

2. ICANN should adopt a threshold exception to the vertical separation requirements to promote competition.

With a limited exception, a registrar should not sell domain services of an affiliated registry. The Network Solutions model would permit a gTLD registrar to sell domain services of an affiliated registry until the registry meets a certain threshold of names, such as 100,000. Once the threshold is met, the affiliated registrar would no longer be permitted to accept new registrations, but would be permitted to manage its existing base. This would help a new registry reach a sustainable level of registrations in order to remain competitive in the market.

By accepting the threshold exception, ICANN would not need to adopt the CRA recommendation for “single organization TLDs”, as this recommendation would already be covered with the threshold and market safeguards.

3. ICANN should retain other market protection measures.
  - a. Registrar and registry functions should be separate and free from discrimination.
  - b. Registries with market power require additional safeguards.

Network Solutions believes price caps should remain for registries with market power.

- c. All registries should be required to provide adequate notice before increasing renewal prices.

**Patrick Mevzek** – Patrick Mevzek notes that he sees no reason to relax the current registry-registrar separation under the current market conditions. He notes that makes sense to let

registries own registrars or the opposite as long as the registrar does not register domain names in the registry it owns or that owns it, provided there are proper safeguards in place. He suggests data should be publicly available to be able to see who owns these entities.

“It is not a big problem already for registries, due to their current low numbers, but it is already a huge problem currently for registrars, as some studies have shown even basic data such as true postal address and phone numbers are not really available for all current registrars.”

He suggests performance criteria for new gTLDs should be established before any new gTLD is introduced.

He also suggests that ICANN study the presence and influence of resellers in domain name markets, and take that into account in all future documents, starting with the RAA and new gTLD process. See <http://forum.icann.org/lists/crai-report/msg00019.html>.

**David Maher, on behalf of Public Interest Registry** – PIR states that the CRA Report has four major shortcomings:

1. “PIR believes that the public interest in supporting competition does not favor a breakdown of the current separation of registry and registrar ownership. Even more so, the (limited) separation in the current rules, as reflected in the contracts so far, should be made symmetric [registrars should not be permitted to own registries].”
2. “PIR believes that the conclusions of the CRAI Report do not give ICANN a basis for an implicit policy to remove all cross ownership restrictions on new gTLDs. PIR further believes that any policy ultimately adopted should be applicable equally to registries and registrars and to existing and new gTLDs.”
3. The proposed experiments in the Report do take account of the risks of self-dealing by registrars that own registries.
4. The creation of the accredited registrar program has led to problems with monitoring compliance and ownership across 900+ registrars. “Blurring lines of registry/registrar ownership would strengthen incentives for the economically strongest registrars to engage in the anti-competitive practices”.

PIR believes ICANN should adopt a general policy limiting or prohibiting cross ownership between registries and registrars. See <http://forum.icann.org/lists/crai-report/msg00020.html>.

**David Maher (forwarding study by Jonathan A.K. Cave)** – PIR submitted a paper titled “A name by any other rows: an economic consideration of vertical cross-ownership between registries and registrars” by Jonathan A.K. Cave of the University of Warwick. The paper is an analysis of the proposal to relax, eliminate or substantially modify cross-ownership of registries and registrars from an economic perspective. The paper sets forth arguments for the continuing necessity of vertical restrictions, and makes recommendations based on the current market.

Cave notes that vertical control can distort competition between registries, encourage registries to become integrated, and may lead to “capture” by market power in a concentrated layer. This may give integrated registrars unfair advantages in bargaining with other registries, and it may give advantages to commercial registries over non-commercial registries that do not own registrars.

Cave states that open-access and price cap controls are essential complements to vertical ownership.

Among the open issues are:

- “The extent of real competition in the registrar market or in the registry market;
- The extent of any anti-competitive behaviour in relation to prices, entry, name access and quality of service and the degree to which this is predatory or collusive;
- Whether competition is actually producing useful efficiencies (lower costs, lower prices, better distribution of name access, incentives to invest in the DNS system or in the economic valorization of names); and
- Whether real (and useful) innovation is going on, as opposed to ‘mere novelty.’”

Cave recommends that these issues can be addressed through 1) the development of a unified model considering the current registry-registrar market and the possibility of vertical control by ownership, 2) a panel econometric study of the competitive performance of DNS markets (including market facing ccTLDs) and of efficiency indicators, and 3) a forward-looking analysis based on models with the increase in TLDs. See <http://forum.icann.org/lists/crai-report/msg00021.html>.

**Paul Tattersfield** – Paul notes that it would be helpful if consultants such as CRA would do similar analysis on other areas of concern on the introduction of new gTLDs (such as large registries push boundaries of their positions). See <http://forum.icann.org/lists/crai-report/msg00023.html>.

He asks a question on what happens to a .brand TLD when brand owners merge.

“One area the report doesn't touch upon are the implications from the creation of pure generic gTLDs and how to guard against the creation of monopoly positions. It is simple to make the statement for allowing open competition and let the market decide, and on the surface many people will support that notion. Of all the people who support the opening up of the DNS to allow generic new gTLDs like .search for example perhaps run by Afiliis or Verisign etc. How many of those same people would show the same enthusiasm if .search was secured by Microsoft?”

**George Kirikos** – George asserts that the CRA Report provided only theoretical arguments, not empirical data, therefore the report should be discounted. He also states that competition should be promoted through a tender process. See <http://forum.icann.org/lists/crai-report/msg00024.html>.

**Jeff Neuman, on behalf of NeuStar** – NeuStar's comments covered the draft Base Agreement, Applicant Guidebook, and CRA Report. This summary only covers the CRA Report comments (which were made in addition to the comments submitted by the gTLD Registry Constituency).

NeuStar notes that it has asked ICANN to set forth the rules regarding cross-ownership in the new gTLD round. They state that registrars can currently apply to operate registries directly or indirectly, but registries (particularly the existing gTLD registries) are prohibited from doing so. Registrars that serve as backend registry operators will be able to offer a direct marketing relationship with registrants, and existing registries are not able to provide this service.

Registrars can offer “shelf space” with a guaranteed distribution channel. NeuStar suggests this has already placed existing registries at a competitive disadvantage.

NeuStar asserts that price cap flexibility must be offered to existing registries (excluding any registry with market power) if offered to new gTLD applicants. “If there are any material changes for the newer TLDs with respect to vertical separation and equal access requirements, because the new TLDs are not price capped, then such changes *must* be applied to NeuStar, unless justified by substantial and reasonable cause.” See <http://forum.icann.org/lists/crai-report/msg00025.html>.

**David Maher, on behalf of the gTLD Registry Constituency** – The gTLD Registry Constituency submitted comments focusing on the following issues in the CRA Report:

1. Price Cap Flexibility – The Registries state “if the conclusions of the CRAI Report are adopted by ICANN, it stands to reason that ICANN would take steps towards relaxing vertical separation and equal access requirements for all new TLDs...if ICANN implements new gTLD expansion relaxing cross ownership restrictions, the RyC believes that it is essential to immediately evaluate whether cross ownership restrictions should be equally relaxed for existing gTLDs.”
2. Test Cases – The RyC agree that the two models in the CRA Report (single organization TLDs and TLDs for which a registry desires to own a registrar, so long as the registrar did not service the registry that owns it or it owns) may be appropriate for the relaxation of the strict restraints currently imposed on registries.

However, before these two models may proceed, more precise definitions are needed to address potential gaming by new operators. The CRA Report is also silent on what may be the majority of business models in the new gTLD process (open generic TLDs or community-based TLDs).

The Registries note that the current registry agreements prohibit a registry operator from “acquir[ing], directly or indirectly, control of, or a greater than fifteen percent ownership interest in, any ICANN-accredited registrar.” The term “acquire” is ambiguous. They ask what if an existing registrar seeks to become a registry, and whether the registrar would be subject to the same restriction.

The Registries suggest that ICANN consider, in addition to the two test cases in the CRA Report, whether some of the existing sponsored TLDs along with smaller new “community-based” TLDs should have similar flexibility with respect to vertical separation and cross ownership rules.

“It would be possible to come up with a numerical threshold of registrations below which relaxation of these requirements could apply, and above which the restrictions would apply. The RyC believes that further study should be conducted on what those thresholds should be and how these registries would transition to new restrictions [upon surpassing the threshold].”

3. Evolving Marketplace – The Registries note that the CRA Report lacks discussion around the changing face of the market likely to come from the introduction of new gTLDs and impact on existing registries.

15 gTLD registries participated in the development of the Constituency comments, and a supermajority of 10 registries supported the comments (VeriSign abstained). See <http://forum.icann.org/lists/crai-report/msg00026.html>.

**Richard Tindal, on behalf of Demand Media** – Demand Media notes that “aspects of this old construct [the market developed to address legacy gTLD registries] do not apply to competitive new TLDs, and in fact will harm the adoption of these TLDs.” Demand Media finds four distinct issues:

1. There should be legal separation of registry and registrar entities. Demand Media agrees.
2. Should all interested registrars be allowed access to a registry’s TLD? Demand Media has no problem with the idea that all interested registrars must be able to sell a given TLD.
3. Should all participating registrars be treated equitably? (They have no problem with this).
4. Should the registry be allowed to sell its own TLD to the public (i.e. should the registry be allowed to own one of the participating registrars)?

On the fourth point, they agree with the CRA Report and believe that a registry should be allowed (under equal terms) to promote a TLD at a retail level via an accredited registrar which is owned by the registry.

Demand Media notes that the report has made a strong case for cross ownership in new gTLDs. See <http://forum.icann.org/lists/crai-report/msg00028.html>.

**Bruce Tonkin, on behalf of Melbourne IT** – Melbourne IT supports allowing a single organization operating a “closed” gTLD to perform both the registry and registrar functions. They provide a definition – a “closed” TLD only allows registrations at the second level by the applicant, and the applicant takes full responsibility for the use of the domain name at the second level. This could be the model for a corporate TLD.

To avoid gaming, Melbourne IT recommends that “closed” TLDs should be limited to single organizations as the registrant for all second level domain names, and these domain names are not able to be licensed to third parties.

On the hybrid model approach covered in the CRA Report, Melbourne IT notes that there are no clear benefits for real start-up registries and there is room for abuse. “The rules for registry-registrar separation are also not clear when a registrar provides back-end registry services for an applicant (and hence may not be designated as the ‘registry operator.’)”

“Small start-up registries will want the option to operate their own registrars to help with the direct marketing and sales of names to get the TLD started.”

Melbourne IT recommends that where a registry offers registrations to third parties, the registry should be allowed to operate its own registrar (up to a cap of 50,000 names in total), as well as allowing other ICANN accredited registrars to offer names on the same commercial terms. Upon reaching the cap, the registry would not be able to sell additional registrations (or registrations for other gTLDs). This would assist a small registry to get started, but ensure that if the registry was dealing with large numbers of registrants, the registrants have the option to choose registrars in a competitive market. See <http://forum.icann.org/lists/crai-report/msg00029.html>.

**Eric Dierker** – Eric submitted a response in follow-up to Melbourne IT's comment, that he "would like to see a critical argument on this logic." "I would only add that any combination of entities be made very clear in any application and business model. That the intent to proceed in any of these manners be made very clear and transparent and binding from the outset and long before any awards be given." See <http://forum.icann.org/lists/crai-report/msg00030.html>.

**Max Menius** – Max's comment on the CRA Report is against existing gTLD registries being able to modify their agreements to remove price caps. See <http://forum.icann.org/lists/crai-report/msg00033.html>.

**Tim Ruiz, on behalf of GoDaddy.com** – GoDaddy advocates the elimination of existing restrictions on registry-registrar cross-ownership, and by doing so, ICANN will stimulate competition. They recommend ICANN consider "a limited and well controlled roll out of the new gTLD process." See <http://forum.icann.org/lists/crai-report/msg00034.html>.

GoDaddy notes that as of 31 July 2008, .COM registrations account for 73.82% of all gTLD domain names, while the combined total of the original gTLDs of .COM, .NET and .ORG account for 91.72% of all gTLD names. They suggest that competition at the wholesale or registry level is not yet evident, as the introduction of 12 new gTLDs has not resulted in a lower share of the market for .COM, .NET or .ORG registrations.

GoDaddy notes that the registry agreements and renewals entered into since 2005 "contain provisions that limited registry ownership of registrars with no rationale provided to the community for such change....In the interests of transparency we would like to know the rationale for this change."

"Eliminating the arbitrary restrictions on vertical integration would enhance the potential for successful competition...It will allow a wider range of experienced applicants with knowledge of domain name consumer expectations and needs. It will also provide newer entrants a better opportunity to succeed."

GoDaddy recommends that ICANN consider reducing the minimum annual fee of \$75,000 to a lower minimum of \$30,000 annually for registries with up to 100,000 names and increasing by \$3,000 increments for every additional 10,000 names up to a maximum of \$75,000.

GoDaddy notes that "the only way to guarantee a new operator will have registrar support is to allow it to own or control a registrar of its own." Ruiz raises several responses to concerns made during the CRA consultations in Washington, DC and Marina del Rey, California. In response to earlier models (such as the Networks Solutions 100,000 name cap or Melbourne IT 50,000 name cap), GoDaddy notes that the limit "provides a warm fuzzy" but if cross-ownership works for the first 50,000 names, there is no sound reason to limit it there. The caps also impose on registrants who want additional domain names in a new name space (or other TLD) to then manage names between two different entities, or incur additional expense in getting their existing names transferred.

GoDaddy cites to existing examples of registry-registrar cross-ownership (Hostway & .PRO, the consortium of registrars that formed .INFO, VeriSign's management of .TV, GoDaddy's joint venture for .ME). "There are no such integration restrictions within several major ccTLD name spaces, yet it isn't collapsing, there is robust competition, and the ccTLD space continues to grow."

Of the two CRA models, GoDaddy recommends that the issue of single owner TLDs be referred back to the GNSO Council for vetting with the community and examination of the policy implications. On hybrid TLDs, GoDaddy notes that this is not a true test case.

GoDaddy also provides a recommendation for a limited, controlled roll out of the new TLD process based on a preliminary Letter of Intent stage. The Letter of Intent process is described in detail in their comment.

### **Mp3 Audio files from DC and Marina del Rey, California Consultations:**

- DC Consultation - <http://forum.icann.org/lists/crai-report/msg00018.html>.
- MdR Consultation - <http://forum.icann.org/lists/crai-report/msg00032.html>.

### **Off Topic Comments Received:**

**Holly Raiche, on behalf of ISOC-Australia** – These comments were on the draft Applicant Guidebook, not specifically on the CRA Report. See <http://forum.icann.org/lists/crai-report/msg00027.html>.

**Adam Martin** (posted a note to be included in the dial-in for the DC consultation).

**Kalab Oster** – His comment is not related to the CRA Report, but is on why he cannot get a TLD if he does not have the \$185,000 application fee. See <http://forum.icann.org/lists/crai-report/msg00003.html>.

**David Ledger** – His comment is more focused on activity like front-running than on separation of registrars and registries. “When the same company can perform more than one function, short term domain squatting becomes possible to do easily and without leaving a provable trace to the outside.” See <http://forum.icann.org/lists/crai-report/msg00004.html>.

Three other spam responses.

### **Next Steps**

ICANN will synthesize the models received in public comments and during the two consultation meetings. The synthesis document will be published for community consideration and comment in the near future.

### **Contributors**

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Liana Ye  
Kalab Oster  
David Ledger  
Vittorio Bertola  
Eric Brunner-Williams (6 comments)  
Michael Palage  
Steve Metalitz (on behalf of the Intellectual Property Constituency)  
Antony Van Couvering  
Adam Martin  
Jon Nevett (on behalf of Network Solutions)  
Craig Schwartz (DC Consultation mp3 file & LA Consultation mp3 file)

Patrick Mevzek  
David Maher (on behalf of .ORG)  
David Maher (copy of study by Jonathan A.K. Cave)  
Paul Tattersfield  
George Kirikos  
Jeff Neuman (on behalf of NeuStar)  
David Maher (on behalf of the gTLD Registries Constituency)  
Holly Raiche (on behalf of ISOC-Australia)  
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