



FINANCIAL PLANNING STANDARDS BOARD

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Sent via email to: [draft-eoi-model@icann.org](mailto:draft-eoi-model@icann.org)

Internet Corporation for Assigned Names and Numbers (ICANN)  
International Square  
1875 I Street, NW, Suite 501  
Washington DC, 20006  
USA

1700 Broadway, Suite 700  
Denver, CO 80290


**p** +1 720 917 0006

**f** +1 720 917 0001

**e** [info@fpsb.org](mailto:info@fpsb.org)

**w** [www.fpsb.org](http://www.fpsb.org)

Dear ICANN:

Thank you for the opportunity to provide comments to the Internet Corporation for Assigned Names and Numbers ("ICANN") on the New gTLD Program: Aspects of an Expressions of Interest ("EOI") Pre-Registration Model proposal. I am the Director of Legal Services of Financial Planning Standards Board Ltd. (FPSB Ltd.), a non-profit association that manages, develops and operates certification, education and related programs for financial planning organizations so that they may benefit the global community by establishing, upholding and promoting worldwide professional standards in financial planning. FPSB Ltd. owns the CFP, CERTIFIED FINANCIAL PLANNER and  trademarks outside the United States and works in conjunction with its members to develop and promote rigorous international competency, ethics and practice standards for CFP professionals in member territories to ensure that consumers looking for qualified financial planners understand and value CFP certification.

There are serious outstanding issues related to the implementation of the new gTLD program that impact the ability of organizations to make a reasoned and informed decision whether to apply for a new gTLD. First, there are lingering concerns regarding the ability of the DNS to remain secure and stable during the launch of the new gTLDs. The stability and security of the DNS is vitally important to non-profit organizations that rely upon a safe and secure platform to share their mission and initiatives with the world and to deliver important informational services.

Second, the ICANN community is awaiting a finalized Draft Applicant Guidebook that ICANN has promised will provide a concrete roadmap for applicants. The requirement for mandatory participation in the proposed EOI process before ICANN has delivered specifics regarding the application process and the roles and obligations of the affected ICANN stakeholders, such as applicants, ICANN staff, registrars, third party vendors and beneficial users of the new gTLDs, places non-profit organizations a difficult position. FPSB Ltd. must evaluate the new gTLD opportunity and make important operational decisions without the benefit of vital details, including ICANN's plans for preventing consumer fraud, ensuring the security of sensitive data and protecting the trade names and/or trademarks of organizations from misuse.

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Finally, and perhaps most disturbing, FPSB Ltd. is being asked by ICANN to make the difficult decision to allocate US\$55,000 of its limited funding and resources to ICANN as a fee to enter the “unknown wilderness” of the new gTLD landscape. FPSB Ltd. and other non-profit organizations will find themselves in the unenviable position of participating in the EOI process to prevent others from having the opportunity to pre-register for a new gTLD and then be first in line to apply for that new gTLD that the organization is considering. Defensive participation in the EOI process severely hinders non-profit organizations, often working with limited financial and technical resources, while speculators and companies backed with funding from venture capitalists and investors have the advantage.

For the reasons above, the introduction of the EOI program at this time and as proposed is not prudent. Non-profit organizations -- international and local, large and small -- work hard to deliver important humanitarian, educational and lifesaving services to the communities they serve and this proposed EOI process will hamper those efforts.

Best regards,

A handwritten signature in cursive script, appearing to read "Tamara S. Monroe".

Tamara S. Monroe  
Director of Legal Services  
Financial Planning Standards Board Ltd.