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**Your ref**

19 January 2010

**Our ref** MAC/la/13120/3/716925

To whom it may concern,

**Procedure for submission of Expressions of Interest**

I, Michael Corcoran of Kerman & Co solicitors in London, strongly believe that the current proposed procedure whereby parties can submit expressions of interest for new TLDs, as proposed by ICANN in December 2009 is in the best interests of ICANN and also importantly the charities and other organisations who wish to submit such expressions of interest.

Our firm, together with a number of clients and other professional advisers have reviewed the proposed procedure, and have encouraged and assisted clients to put in place procedures and policies that will support their tenders under the current proposed procedure. Parties have understood the current recommendations, finding them to be clear and well thought through, as well as equitable and transparent, providing a framework within which they and others can take the first step in what is expected to be a highly competitive bidding process.

Whilst consultation is important to make sure the process is right, we like many others do not believe material changes should be made to accommodate the "special interests" of parties not wishing to submit EOIs but rather advise parties on and make money from the EOI process. Further any delay or material change to the process to protect special interests or to accommodate those who have not to date taken the necessary steps to be in position to participate in the EOI process (such as large corporations) sets a dangerous precedent that could cause further significant delays, and result in a process that is weighted in favour of large corporations, and against the charities and other organisations who have to date supported ICANN and participated in the TLD process, incurring significant costs along the way.

If you wish to discuss any of the above thoughts or comments please feel free to reply at this email address or contact me on the details below.

Yours faithfully

  
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Associate

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