



Office of the General Counsel
2025 E Street, NW
Washington, DC 20006

Debra Y. Hughes
Direct Dial: (202) 303-5390
Facsimile: (202) 303-0143
Email: HughesDeb@usa.redcross.org

January 27, 2009

Via Email: draft-eoi-model@icann.org:

Re: Comments Regarding ICANN's "New gTLD Program: Aspects of an Expressions of Interest and Pre-Registration Model"

Dear Mr. Beckstrom, Mr. Dengate-Thrush and the ICANN Board of Directors:

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 an employee of the American Red Cross, a non-profit/philanthropic organization and one of approximately 180 member national societies of the International Federation of Red Cross and Red Crescent Societies.

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 and philanthropic organizations that rely upon a safe and secure platform to share their mission and initiatives with the world and to deliver important humanitarian and informational services.

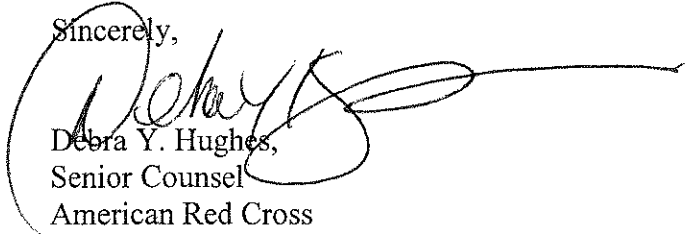
Second, the ICANN community is awaiting a finalized Applicant Guidebook that ICANN has promised will provide a concrete roadmap for applicants. The requirement for mandatory participation in the proposed EOI process before ICANN has delivered specifics regarding the application process and the roles and obligations of the affected ICANN stakeholders, such as applicants, ICANN staff, registrars, third party vendors and beneficial users of the new gTLDs, would place non-profit organizations in a difficult position. Our organizations would have to evaluate the new gTLD opportunity and make important operational decisions without the benefit of important 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 in the new gTLDs.

Finally, and perhaps most disturbing, philanthropic and non-profit organizations that rely upon the generosity of the public for financial support, are being asked by ICANN to make the difficult decision to allocate US\$55,000 of our organization's limited, donated funding and resources to ICANN as a fee to enter the "unknown wilderness" of the new gTLD landscape. Non-profit organizations will find themselves in the unenviable position of participating in the EOI process, not because they have decided on the merits to pursue a new gTLD delegation, but simply to prevent others from having the opportunity to pre-register for a new gTLD and thus be awarded the exclusive right to apply for the same new gTLD that the organization is considering. Such defensive participation in the EOI process would severely hinder non-profit organizations,

often working with limited financial and technical resources, while speculators and companies backed with funding from venture capitalists and investors would 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.

Sincerely,



Debra Y. Hughes,
Senior Counsel
American Red Cross