ICANN
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Attention: New gTLD Evaluation Team

Subject: Input on Use of a Drawing for Prioritizing New gTLD Applications

Firstly, Punto 2012 would like to congratulate Fadi Chehadé on his appointment as ICANN CEO; we believe he has already demonstrated incredible leadership potential and very much look forward to working with him. We would also like to thank ICANN and Mr. Chehadé for so carefully reviewing applicant and community feedback with regards to the New gTLD Evaluation Process.

Punto 2012 believes the Prioritization Drawing solution is the most fair and appropriate way to process applications. We believe the utility and simplicity of the system accurately reflect the community's wishes and the goals of the New gTLD Program.

As previously communicated to ICANN, Punto 2012 additionally supports ICANN's goals of increasing diversity and competition in the Registry market, and we are excited and honored to be one of a handful of participants from the LAC region. We look forward to a truly global internet where citizens of every country are empowered to participate in its governance and feel completely enfranchised.

We therefore urge ICANN to not only prioritize IDN applications but also applications from lesser-represented constituencies. This is the only way to ensure applicants from under-represented regions such as Latin America and the Caribbean and Africa are not lost in the crowd of applicants from more traditional Registry markets such as North America and Europe. We were pleased to hear several GAC members make this request during the Toronto 45 meeting and urge ICANN to listen to their – and our – voices.

While we recognize that we are not the only group requesting prioritization during the drawing process, we do believe that there is an objective and legitimate case for prioritizing applications from LAC / Africa:

1. One of the goals of the New gTLD program was to introduce diversity and competition to the Registry market – where more so can this be achieved than in geographic regions who are currently underrepresented (and will continue

to be, judging by the small number of applications submitted from these regions)?

2. A geographic distinction is not subjective the way some other divisions such as "public interest" or "community benefit" may be – ICANN's own statistics break down the number of applications submitted by region

3. The number of applications involved is easily quantifiable and their addition to the prioritization processing track is entirely manageable – there are only 17 applications from Africa and 24 from LAC, which together represent only 1/3 of the number of IDN applications which currently stand to be prioritized

4. The prioritization of IDNs – while in no way objectionable – does not expand "ownership" of the Internet to underrepresented regions. While we fully support the prioritization of IDNs and the profound positive impact it will have on user experience, we do not believe it will have significant effect on ICANN's goals of expanding the registry market: a significant portion of the IDN TLD applications have been submitted by large global players already active in the Registry marketplace

Processing African / LAC applications along with IDNs: the change (to ICANN and the wider applicant community) is small, but the message speaks volumes. ICANN has stated its desire and intention to be more inclusive, global, and multinational, and we are confident that Mr. Chehadé and his team will achieve this. What better way for ICANN to affirm its commitment to openness, competition, fairness, and globalization than by prioritizing LAC / African applications? We believe this is the necessary first step toward achieving ICANN's goals of a truly global internet and urge you to consider our request.

Sincerely yours,

Aaron Grego
President