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Geschäftszahl LH-TO-10/78

Innsbruck, 08.11.2012

Dear Mrs. Willett!

This letter is a response from Land Tirol to ICANN's request for comments on the Use of a Drawing for Prioritizing New gTLD Applications.

#### Prioritization of Applicants

Land Tirol appreciates ICANN's proposal **to prioritize** IDNs as they are believed **to serve the global public interest**. Land Tirol acknowledges the 17 October 2012 GAC Communiqué that includes "Some [GAC-]members consider that geographic name gTLDs approved by the relevant government authority, community names and applications from developing countries should likewise be prioritized."

Land Tirol concurs with the members of the GAC that suggested community and geographic names be prioritized.

**Community applications** receive preferential status in the new gTLD program because of the commitments that have been made to **serve the public interest** of those respective communities. As self-identified community applicants, all were required to respond to Applicant Guidebook question 20 that necessitated they define their registration restrictions (i.e., eligibility, name selection, content/use, and enforcement), accountability mechanisms and to provide endorsement letters from their respective communities. The commitments these applicants made and the endorsements they received demonstrate and substantiate their role in serving the public interest. Additionally, these applicants will be contractually bound by ICANN to their commitments and be subject to enhanced compliance mechanisms such as the Registration Restrictions Dispute Resolution Procedure (RRDRP).

Each of the **GeoTLD applications** has to have the support or non-objection of the respective government(s) or public authorities before approval by ICANN; some GeoTLDs have even been filed by public authorities themselves. This requirement for government support or non-objection is a core element of the GAC Principles Regarding New gTLDs issued in March, 2007. These public policy principles were introduced to safeguard the global public interest!

*Principle 2.2 says: "ICANN should avoid country, territory or place names, and country, territory or regional language or people descriptions, unless in agreement with relevant governments or public authorities.*

In this way GeoTLDs complement the provisioning of ccTLDs, **GeoTLDs are in the interest of the relevant national and global Internet community** on a focused local basis.

Land Tirol believes that ICANN should **prioritize community and geographic applications** as it would be consistent with the preferential position they are afforded in the new gTLD program.

Sincerely yours,

A handwritten signature in blue ink, appearing to be "Martin", written in a cursive style.