

Consumer Metrics – Public Comments Review Tool
15 May 2012

	Comment	Who / Where	WG Response	Recommended Action
Consumer – Definition				
1.	<p>While it is understood that the use of the term "Consumer" was made by the Board using an expression from the "Affirmation of Commitments", the ALAC emphasizes the problem that the use of such a term causes for our community, especially in some of our regions.</p> <p>Refer to Case Study, Reservations regarding the "consumer" term in German</p> <p>Recommendation: Although the report of the Working Group clearly defines the term "Consumer" as "actual and potential Internet users and registrants", the ALAC believes that the correct term to use in all publications instead of "Consumer" should be "Internet User" and "Consumers" as "Internet Users" whether they are registrants or not. The recommendation of the ALAC is for the ICANN Board to use the term "Internet User" in future work and communication referring to "actual and potential Internet users". The ALAC leaves it to the Board to determine how to respond to third parties that use the term "Consumer" in light of the dissociation in the international context, an example of which is provided in this Statement.</p>	ALAC / Public Comment	<p>ALAC Statement on the Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf</p> <p>15 MAY – Should WG change its term or is the advice to the Board to change to Internet User? WG should make it clear that it is ill-conceived in this context.</p> <p>Findings & Recommendations for Consumer – Consumer deemed out of scope but worthy of mention</p>	<p>Add ALAC advice recommendation to notes on Page 4 definition of Consumer to include Internet User.</p> <p>Possible: Create a Findings & Recommendations Annex to Advice letter</p>
2.	Summary of Comment: Distinguish between consumer registrants vs professional registrants	GPM Group / Costa Rica Session	The definition addresses all types of registrants, and does not require the distinction	No Action
Consumer Trust – Definition				
3.	Definition of "Consumer Trust". We believe the definition of this term is fundamentally sufficient. However, in order to clarify its meaning, we suggest changing the word "its" in "its proposed purpose" – which could refer to "confidence" or "name resolution" or "TLD registry operator" – to "the registry's" so that it is clear that the purpose being reviewed is the one set forth by the registry as part of its application and	INTA / Public Comment	<p>INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf</p> <p>15 May - Are there legal issues with changing the language definition to</p>	Change definition to "the Registry's" from its.

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	operating agreement with ICANN		a more clarified entity	
4.	Consumer Trust is defined as the confidence registrants and users have in the consistency of name resolution and the degree of confidence among registrants and users that a TLD registry operator is fulfilling its the Registry's proposed purpose and is complying with ICANN policies and applicable national laws.	INTA / Public Comment	15 May - INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf	Change definition to "the Registry's" from its.
5.	Summary of Comment: degree of confidence and consistency in how the 2nd level names are being used – consumer experiences how the names are used on the internet	Bruce Tonkin / Costa Rica Session	Slide 9 of Consumer Trust – Consistency of Consumer Expectation, WG took narrow scope for definition Expectation of function by the Applicant of the gTLD; False expectation by user is not a scope of the gTLD Applicant	Denote some members of the community indicate that consumer expectation should be included, but Applicants only responsible for what they state in the new gTLD applications. Approaching scope boundary of ICANN
6.	Summary of Comment: Definition is not broad enough, issue that ICANN Policy & Applicable Laws does not directly apply Consumer Trust.	Shandra Locke / Costa Rica Session	Threshold issue to cover things outside of scope of ICANN policy – Point to survey of CT to measure consumer's confidence and things like malware. Point to survey included in metrics about confidence, malware, etc.	Communicate better that we are just "measuring", not making recommendation for ICANN to act upon relevant policy response. Work with definition and metrics at the same time.
7.	Summary of Comment: Define CT in context of new gTLDs. Definition on screen is not same on screen vs, draft letter. Refers to AGB Q18 application. Stay away from subjective words and what is your mission purpose. Promises as referred to in Consumer Metrics should refer to Q18 of AGB; Expanding context of the definition	Ray Fassett / Costa Rica Session	Metrics are crucial in evaluating the definition Q18 will be used to evaluate the Mission and Purpose. All questions are relevant, but may not be included in the Ry agreement. Applicants of standard apps can change their mission and purpose. Review Ry website on what their intended purpose is.	Include Application answers by new gTLD applicants within our metrics charts. Measure Q18 and others three years out against original mission and purpose

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8.	Summary of Comment: Acknowledged limitation of scope within ICANN vs. consideration of other access forms for Internet. In context of Consumer Trust & Choice	Evan Lebovitch / Costa Rica Session	How do we measure it, and does it encroach on our scope/threshold for ICANN? Noted in top of Page 3 of Advice Difficult to measure, but could be tracked in the context of Innovation	Create a few paragraphs on this topic, update & expand language in Advice that this is difficult to measure, a function of innovation, and perhaps a scope issue for ICANN.
9.	Question: TRUST is a very flexible word : several definitions can be attributed but at the end, what does a consumer get in return if he/she trusts the other party ? Look at how registrars are handled by registrars. Do we need different types of TRUST?	Rudi Vansnick / Costa Rica Session	<ul style="list-style-type: none"> •http://reports.internic.net/cgi/registrars/problem-report.cgi •Review Ombudsmen complaints. •Briefing from Compliance as to what requirements/what's possible within the new system. •Review of existing ICANN Complaint system data by category to gauge consumer trust, legacy data vs new gTLDs •New Measure CT: Complaints Rr handling, new vs legacy complaint; Source, ICANN; 3 yr target, Comparison of legacy vs new gTLD, rate of complaints •Ry should be part of complaint system going fwd. 	Create two metrics for general complaints for Rr & Ry submitted to ICANN
10.	Summary of Comment: Effect of consumer trust if ICANN should interfere // Jonathon Robinson – Useful perspective for ICANN to fulfill their promise; ICANN is a party	Ray Fassett / Costa Rica Session		
Consumer Trust – Metrics				
11.	Survey of perceived consumer trust in DNS, relative to experiences before the gTLD expansion. Survey could measure experiences with phishing, parking sites, malware and spam; confusion about new gTLDs; user experience in reaching meaningful second-level TLDs; registrant experience in being in a different gTLD; trademark owner experience with regard to cybersquatting (prevalence; cost and satisfaction with results when a resolution is sought)	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.7, metrics #4) 15 May - Survey generally targets a specific group. Listing of Trademark may be an issue.	Survey of perceived consumer trust in DNS, relative to experiences before the gTLD expansion. Survey could at least measure experiences with phishing, parking sites, malware and spam ; confusion about new gTLDs; user experience in

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	Stated survey criteria are far too narrow. Also, see below for other measures that could be the subject of survey.		<p>Instead of TM Owner, change to Registrant</p> <p>Registrant may not be aware of cybersquatting unless it affects them directly. Last phrase may not be required.</p> <p>1st sentence provides the metric, remainder gets to details or suggestions of what the survey may include</p> <p>Survey should take in to consideration of types of internet users and types of experiences</p> <p>Single time survey with their retrospect. Perhaps run survey twice.</p> <ul style="list-style-type: none"> • 1 or 2 polls • Survey Groups • DNS Issues wrt Trust 	<p>reaching meaningful second-level TLDs; registrant experience in being in a different gTLD; Registrant experience with regard to cybersquatting prevalence, cost and satisfaction with results when a resolution is sought.</p> <p>Add to Findings annex – that survey group should consider user types, sampling, and experience and qty of surveys</p>
12.	<p>Relative incidence of notices issued to Registry operators, for contract or policy compliance matters</p> <p>Relative incidence of breach notices issued to Registrars, for contract or policy compliance matters</p> <p>“Lower than incidence in legacy gTLDs” is far too low a bar for a target. This assumes that any improvement over legacy gTLDs is a “success.” For each of these metrics the target should be a stated percentage lower than in legacy gTLDs (e.g., 50% lower).</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf</p> <p>Advice Ltr - (p.7, metrics #6,7)</p>	
13.	<p>Relative incidence of UDRP Complaints, before and after expansion</p> <p>See above. Also, may need to aggregate with URS (or report both separately and in the aggregate) to compare “apples and apples” (since the availability of the URS is intended to reduce</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf</p> <p>Advice Ltr - (p.7, metrics #8)</p>	

Comment [bac1]: Review for 5/22 Call

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	<p>the quantity of UDRP cases even where problems are at a same or higher level).</p> <p>Relative incidence" should be calculated by the total number of UDRP or similar domain name proceedings (e.g., usDRP) filed in the legacy gTLDs from 1/1/2000 over the total number of domain name registrations registered in the legacy gTLDs from 1/1/2000.</p>			
14.	<p>Relative incidence of UDRP Decisions against registrant, before and after expansion</p> <p>See above.</p> <p>"Relative incidence" should be calculated by the total number of UDRP or similar domain name proceedings (e.g., usDRP) filed in the legacy gTLDs from 1/1/2000 where the order was against the registrant over the total number of such UDRP proceedings.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.7, metrics #9)	
15.	<p>Quantity & relative incidence of URS Complaints Quantity & relative incidence of URS Decisions against registrant</p> <p>May need to aggregate with UDRP (or report both separately and in the aggregate) to compare "apples and apples" (since the availability of the URS is intended to reduce the quantity of UDRP cases even where problems are at a same or higher level.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.8, metrics #2,3)	
16.	<p>UDRP and URS do not capture a large part of the contentious matters involving domain names. We therefore believe an accurate measurement of conflicts due to the new gTLD program should include this measure as well as that for UDRPs and URS.</p> <p>Measure: Quantity and relative incidence of litigation Complaints Source: Litigants and/or Survey Provider Difficulty: Moderately difficult, as it would require self-reporting. In addition or in the alternative, information could be gathered by survey.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New	
17.	<p>Measure: Quantity and relative incidence of litigation Decisions against registry, registrar or registrant Source: Litigants and/or Survey Provider</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf	

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	Difficulty: Moderately difficult, as it would require self-reporting. In addition or in the alternative, information could be gathered by survey.		New	
18.	<p>We believe an accurate measurement of conflicts due to the new gTLD program should include this measure as well as those measuring number of UDRP or URS proceedings, and litigation.</p> <p>Measure: Quantity and relative incidence of acquisitions of infringing domain names (other than by UDRP or litigation)</p> <p>Source: Acquirers and/or Survey Provider</p> <p>Difficulty: Moderately difficult, as it would require self-reporting. In addition or in the alternative, information could be gathered by survey.</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf</p> <p>New</p>	
19.	<p>This will be directly correlative with “trust” in the new gTLDs</p> <p>Measure: Relative cost of overall domain name policing and enforcement programs by trademark owners</p> <p>Source: Trademark Owners and/or Survey Provider</p> <p>Difficulty: Moderately difficult, as it would require self-reporting. In addition or in the alternative, information could be gathered by survey.</p> <p>3 Yr Target: Relation between number of domains and cost of policing and enforcement of them (i.e. Enforcement and policing cost /number of Domain names) should decrease.</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf</p> <p>New</p>	
20.	<p>Quantity of spam received by a "honeypot" email address in each new gTLD</p> <p>“Lower than incidence in legacy gTLDs” is far too low a bar for a target. This assumes that any improvement over legacy gTLDs is a “success.” For each of these metrics the target should be a stated percentage lower than in legacy gTLDs (e.g., 50% lower).</p> <p>None noted (assuming that there are “honeypot” email addresses in all legacy gTLDs)</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf</p> <p>Advice Ltr - (p.8, metrics #6)</p>	
21.	With regard to the measures of consumer trust on page 7, the metric “Lower than incidence in legacy gTLDs” may not be	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Compe	

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	<p>realistic for determining “Relative incidence of notices issued to Registry operators, for contract or policy compliance matters”.</p> <p>We believe that the incidence of notices for existing gTLDs has been quite low. We suspect, considering the large number of new players expected to enter the market for new gTLDs, that it might be reasonable to expect a higher incidence of such notices.</p> <p>A better metric might contain a range e.g. ‘+/- 5% of legacy gTLDs’. One way of examining this further would be to request the actual incidence rate for existing gTLDs over the last few years; if it is extremely low (as we suspect), using it might set an unreasonably challenging expectation for new gTLDs. Also, the requirements for existing gTLDs are not the same as for new gTLDs so, at a minimum, any comparison done should note this in interpreting the results.</p>		<p>tition Final.doc Advice Ltr - (p.7, metrics, ALL)</p>	
22.	<p>Summary of Comment: Page 7 Metrics – “Relative incidence of notices issued to Registry operators, for contract or policy compliance matters” + or – 5% of Legacy gTLDs – being unfair for new gTLDs due to more variation versus legacy TLDs having the advantage Unfair for new player to have too high of standards</p>	<p>Chuck Gomes / Costa Rica Session</p>	<p>More lenient with respect to breach notices and the targets; stating current TLDs have a good head start in positive behavior</p> <p>Relative incidence to a denominator (Operators vs. Registration)</p> <p>CCTC Clarify how we do the math.</p> <p>Use Chg Mgmt to adjust targets based upon real data</p>	<p>Modify 3 Year target; clarify how we “do the math”</p>
23.	<p>Finally, in reviewing the overall approach, we note that consumer trust will be based not only on industry participants and their activities within the market, but also on the behavior and operation of ICANN. Industry participants and consumers all need to be able to rely on the stable, secure and predictable governance of the critical internet functions that ICANN is</p>	<p>RYSG / Public Comment</p>	<p>RySG Comments Consumer_Trust,_Choice_&Competition Final.doc New</p>	

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	responsible for overseeing. Any additional metrics which can deal with these functions would be welcomed.			
Consumer Choice – Definition				
24.	<p>Definition of “Consumer Choice”. We believe the definition of “consumer choice” should be expanded. “Consumer” is defined in the Advice as “actual and potential Internet users and registrants.” We understand this to mean not only parties which register or may register domain names, or users of the new gTLD program, but the entire range of users of the Internet itself. This includes companies, consumers, children, and others. However, the proposed definition of “Consumer Choice” appears not to relate to the experience of or choice enjoyed by users. The Advice defines “Consumer Choice” as “the range of options available to registrants and users of domain scripts and languages, and for TLDs that offer choices as to the proposed purpose and integrity of their domain name registrants.” Contrary to the definition of “Consumer” then, this definition does not relate to the experience of or choices of “users” in the scope of domain names, but only to the availability of domain names to potential registrants and the integrity of registries to their contracted-for purposes. We do not believe that it is enough to consider whether the new gTLDs give users a greater choice of domains and sites within domains to turn to. In order to determine whether the expected expansion of the number new gTLDs provides a meaningful choice, we believe metrics should be considered that measure the positive and negative aspects of presenting users with a broader selection, their ability to determine trustworthy domains as opposed to others, and the ability to find the sites and resources that they are seeking. This would inevitably include consideration of the ability of search engines to find and link consumers to the sites and resources for which they are searching.</p> <p>From a trademark standpoint, we believe this search engine analysis should include an analysis of the accuracy of search engine results both before and after the new gTLDs are</p>	INTA / Public Comment	INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf	

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	introduced, along with an analysis of the ability of search engines to discriminate between sites which meet the proposed purposes for which they were established as opposed to those that do not. Another possible area of inquiry might be whether new gTLDs provide a greater range of sites, registrants, and resources than existed prior to the program.			
25.	Consumer Choice is defined for registrants and users as the range of options available to registrants and users for domain scripts and languages, and for TLDs and for users as the range of options for users to access and use websites and resources in both legacy and new TLDs that offer choices as to the proposed purpose and integrity of their domain name registrants.	INTA / Public Comment	INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf	
26.	Andy Mack – Outreach necessary to urge ICANN to spread the word more, and somehow measure that. No explicit measures of communications program. If we wait two to three years down the line. Andy to provide metric <ul style="list-style-type: none"> • Jonathon Zuck – Aim Andy’s question to Bruce – How ICANN might manage these metrics? • Bruce Tonkin – ICANN Community accept the definitions of these terms. ICANN approve the policy that defines those terms. 2nd issue – Metrics – Cost of Delivering them; degree of resource implications; Targets part of strategic planning; Consumer Trust part of Strategic Plan; # of uses of Consumer is large. Should have a shared definition of Consumer 	Andy Mack / Costa Rica Session		Incorporate Outreach/Awareness of new TLDs questions in to survey
Consumer Choice - Metrics				
27.	CBBB requests that the costs of trademark abuse be tracked by calculating the number of defensive registrations that will follow in the new gTLD registries, as well as calculating the number of blocking of trademarks that will occur during sunrise periods in the new gTLDs. Such costs are adverse to the public interest and ultimately consumers. To minimize such costs, CBBB strongly urges ICANN to put in place a central trademark clearinghouse for valid trademark holders to block registries and registrars from sales of such valid trademarks to registrants. This will reduce the amount of profiteering that	CBBB/Public Comment	Advice Ltr - (p.10, metrics #1,2, 3)	

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	has taken place in the past when registrars are allowed to sell others' trademarks, which does nothing to increase competition on the Internet. ICANN has essentially allowed the blatant violation of others trademark rights for too long and if it continues to allow this, it should document the amount of such illegal activity.			
28.	<p>Measure the increased geographic diversity of registrants across all new gTLDs, as an indication of new choices presented by gTLDs expansion. (do not count privacy/proxy registrations)</p> <p>Geographic diversity of registrants actually using the new gTLDs. Is there widespread adoption of new gTLDs in regions around the world that are representative of the Internet's reach? Has the program been accepted and understood across the regions? Is there evidence that new gTLDs (as a general group) are being registered and used across the world? (Note: this is different that diversity in who is managing the new gTLDs)</p> <p>Ability of new gTLDs to empower communities, regions, brands and people. Consider doing a study of a group of communities (around delegated new gTLD strings) before and after they launch their gTLD, compared to similar communities who do not have gTLDs strings.</p>	Annalisa Roger/Public Comment	Advice Ltr - (p.10, metrics #4)	
29.	<p>As noted above, we believe that the definition of "Consumer Choice" should include consideration of the experience of Internet and DNS users. The CTWG should consider including the following description of a survey measure in the section on "Consumer Choice" metrics:</p> <p>Survey of consumer experience and ability to locate sites offering information, products, or services for which they have searched the Internet, relative to their ability to do so before the gTLD expansion. The survey could measure consumers' ability to locate sites utilizing domain name searches rather than keyword searches.</p> <p>Although the measures include several that analyze the</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New	

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	<p>quantities of TLDs using IDNs or languages other than English, these do not provide a satisfactory measure of the relative success of the opening of the DNS to IDNs. Clearly, by permitting the establishment of new gTLDs using non-English, and non-Latin characters and scripts the DNS is offering a greater choice. However, in addition to demonstrating that such domains are being registered, we believe the relative success of allowing such domains should be tested as part of the analysis. We therefore propose that another measure be included which compares the percentage of IDNs in each script or language to the percentage of people who speak or utilize each particular language or script. These percentages should converge over time.</p> <p>Determining whether new gTLDs actually provide for greater consumer choice or merely a proliferation of new domain names is an important measure. Thus, the measure of the number of defensive registrations is an important metric for consumers who rely on trademarks and trademark owners who protect their respective marks. In this regard, we note that the “defensive registration” measure includes not only top level domains, but second level domains. We do not, however, believe that privacy/proxy registrations should be excluded from the numerator in this calculation.</p>			
30.	<p>Survey a sample of “duplicate” registrations in new gTLDs. For purposes of this measure, “duplicate” registrations are those where registrant reports having (and still maintaining) the same domain name in a legacy gTLD.</p> <p>As for the measure of duplicate registrations in new gTLDs, we note that this measure is to be based on a survey of registrations of second level domain names in both a new gTLD and in legacy TLDs to determine a relative percentage of domains which do not increase the amount of consumer choice. Although described as a survey, we believe a better measure could be obtained by suggesting that the Review Team develop online searches and analysis of actual online sites rather than relying on a survey of site owners. Additionally, similar studies have already been undertaken, including several</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.10, metrics #3)	

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	relied upon by ICANN's economic experts. ¹ This may be the intent of the measure, but this is not clear from the draft Advice.			
31.	<p>Registrars' websites should clearly disclose gTLD benefits and restrictions in the terms & conditions for each respective TLD they offer.</p> <p>We also suggest that, in addition to determining whether registry websites "clearly disclose benefits and restrictions" of the particular registry, there should be an empirical determination made whether such community-based websites actually meet the proposed purpose of the registry. Only if they meet their proposed purposes by providing the disclosed benefits and restrictions should they be considered as increasing consumer choice.</p> <p>The ease of locating and accessing Terms and Conditions should be considered.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.9, metrics #2)	
32.	<p>gTLD registry benefits and restrictions should be clear and understandable to registrants and users.</p> <p>Both "plain language" and clarity of benefits and restrictions should be measured and rated.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf	
33.	<p><u>Measure: Accuracy of search engines in locating and linking to pages offering goods or services or information being sought by internet users.</u> <u>Source: User survey, study of search results for trademark and generic term searches or feedback from search engines</u> <u>Difficulty: Could be difficult to obtain empirical data unless a study is conducted using trademark and generic search terms to obtain statistically significant data</u> <u>3 Yr Target: Sites featuring trademarked goods or services, or the goods or services represented by generic terms are accurately listed in search results in hierarchical order.</u></p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New	
34.	<p><u>Measure: The percentage of IDNs in each script or language should be compared to the percentage of people who speak or utilize each particular language or script</u></p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf	

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	<p>Source: Registry websites and statistical determination of number of speakers or script users Difficulty: Must identify reliable source of number of speakers or users of each language or script. 3 Yr Target: This percentage should increase over time.</p>		New	
35.	<p>Measure: Quantity of TLDs using IDN scripts or languages other than English which are independent of national governments or government control. Source: Registry and registrar websites Difficulty: Presume TLDs not owned by government or government agency qualify; More difficult to determine government control unless self-identified in Terms of Use 3 Yr Target: Increase in number of independent IDN TLDs over time – measure at first round, second round, etc.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New	
36.	<p>A defensive registration is not seen as an improvement in choices available to registrants. For purposes of this measure, “defensive registrations” are Sunrise registrations & domain blocks. Measure share of (Sunrise registrations & domain blocks) to total registrations in each new gTLD. (do not count privacy/proxy registrations)</p> <p>Percentage change should be considered indicative of degree of success. Since blocks and sunshine registrations require a registered trademark, there is no need to exclude privacy/proxy registrations from the numerator.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.10, metrics #1)	
37.	<p>Relative share of registrations already having the same domain in legacy gTLDs. For this measure, count all registrations that redirect to domains in legacy gTLDs. (do not count privacy/proxy registrations)</p> <p>We asserts that 15% is too great of a percentage and that the survey of defensive registrations referenced in "An Economic Framework for the Analysis of the Expansion of Generic Top-Level Domain Names" would support a percentage between 3% and 9%.</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.10, metrics #2)	
38.	<p>Survey a sample of “duplicate” registrations in new gTLDs. For</p>	INTA / Public	INTA Internet Committee	

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	<p>purposes of this measure, “duplicate” registrations are those where registrant reports having (and still maintaining) the same domain name in a legacy gTLD.</p> <p>NOTE: This would appear to remove from computation information regarding registrants that have a policy of cross-registration of domain names and trademarks. Would weigh against finding of choice.</p>	Comment	<p>comments on Metrics Chart 17 Apr 2012.pdf Advice Ltr - (p.10, metrics #3)</p>	
39.	<p>We support, provided that the survey includes the consumer accurately locating sites and screening out cybersquatting and parked domain names. See above-survey recommended in consumer choice.</p> <p>Measure: Survey of consumer ability to accurately locate sites offering information, products, or services for which they have searched the internet, relative to their ability to do so before the gTLD expansion. Survey could measure their ability to locate sites utilizing domain name searches rather than keyword searches.</p> <p>Source: Online survey or empirical study</p> <p>Difficulty: User survey may be too subjective to provide data;</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New</p>	
40.	<p>Measure: Measure actual internet traffic to legacy TLDs and new TLDS</p> <p>Zone and root server use data</p> <p>Source: The intent is to determine if there has been an increase in traffic to new TLDs. May want to exclude redirected traffic if possible.</p> <p>Difficulty: Traffic to new TLDs should increase proportionally as compared to traffic to legacy TLDs</p>	INTA / Public Comment	<p>INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf New</p>	
41.	<p>Quantity of TLDs using IDN scripts or languages other than English.</p> <p>Under ‘Measure of Consumer Choice’ on page 9, we believe that the meaning of “Quantity of TLDs using IDN scripts or languages other than English” should be made clearer. We understand that the metric, “Increase in number of TLDs offering these choices, relative to 2011” refers to the quantity of operators offering actual IDN gTLDs; if this understanding is correct, we believe it will be clearer with revised wording along</p>	RYSG / Public Comment	<p>RySG Comments Consumer_Trust,_Choice_&Competition Final.doc Advice Ltr - (p.9, metrics #4)</p>	

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	the lines of "Increase in the number of TLDs in IDN scripts or languages other than English, relative to 2011" since the current wording could be interpreted to cover only the use of IDN scripts on websites or in promotions, etc., but not in the TLD string itself. The same point probably applies to the next measure: "Quantity of Registrar websites offering IDN scripts or languages other than English."			
42.	<p>Quantity of different national legal regimes where new gTLD registries are based.</p> <p>The last measure on page 9 is "Quantity of different national legal regimes where new gTLD registries are based." We believe that this refers to the regimes in which new gTLD registry operators (the ICANN contracted parties) are located, not the regimes where new gTLD registry service providers might be located when the operator and service provider are not one and the same entity. We believe it would be helpful to make this explicit.</p>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc Advice Ltr - (p.9, metrics #6)	
43.	<p>A defensive registration is not seen as an improvement in choices available to registrants. For purposes of this measure, "defensive registrations" are Sunrise registrations & domain blocks. Measure share of (Sunrise registrations & domain blocks) to total registrations in each new gTLD. (do not count privacy/proxy registrations)</p> <p>We do not believe that it is accurate to conclude that a sunrise registration is necessarily a defensive registration. If a mark holder registers a name in a sunrise period and then goes on to utilize the same name on a website or in another way, that should not be counted as a defensive registration. Additional sophistication is required here in order to determine the fraction of the registry given over to purely defensive registrations.</p>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc Advice Ltr - (p.10, metrics #1)	
44.	<p>Quantity of unique gTLD Registry Service Providers before and after expansion</p> <p>Is a ccTLD operator that becomes a gTLD operator considered a</p>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc Advice Ltr - (p.11, metrics #4)	

	Comment	Who / Where	WG Response	Recommended Action
	unique provider? We believe it should be. If this is the case, the metric of '2x' might be achievable; if not, it might be hard to achieve because of the cost of becoming a new registry service provider.			
45.	<p>Relative share of new gTLD registrations held by "new entrants". For purposes of this measure, "new entrants" are gTLDs run by Registry Operators that did not operate a legacy gTLD.</p> <p>Does this count existing ccTLD operators who become gTLD operators as new entrants? We believe it should, and that this should be explicit.</p>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc Advice Ltr - (p.11, metrics #6)	
46.	<p>Chuck Gomes – Equate sunrise registrations to defensive registrations.....Registrations by Rights Holders b/c they will use the name. IDN version of .com, brand will not register in scripts to defend, but to use. Not so complicated to measure but may provide false results</p> <ul style="list-style-type: none"> • Steve DelBianco – might have to restrict this measure only TLDs open to general public...."redirected registrations" • Chuck Gomes – Redirected does not necessarily mean defensive either • Jonathan Zuck – Start tracking data. How it get interpreted and evaluated does not need to be pre-determined 	Chuck Gomes / Costa Rica Session	<p>Determine criteria of defensive registrations, b/c sunrise may not necessarily mean a defensive registration, but 1st chance opportunity to acquire domain. Redirects do not necessarily mean redirect either.</p> <p>Don't want to set aggressive 3yr. targets</p>	Cross out (do not count privacy/proxy registrations) from first & second row on page 10. For Sunrise.
Competition - Definition				
47.	Between the final draft (dated 22 February 2012) of the Advice Letter and ICANN's February 23rd posting, there was an interesting switch in emphasis that suggests ICANN now is trying to minimize the role of competition as a justification for introducing new gTLDs. The title of the final draft ("Advice requested by ICANN Board regarding definitions, measures, and targets for COMPETITION, consumer trust and consumer choice" has now become ""Draft Advice Letter on Consumer Trust, Consumer Choice, and COMPETITION [emphases added]	Michael Flynn/Public Comment	Reply Comments of Michael Flynn re Competition.pdf	

	Comment	Who / Where	WG Response	Recommended Action
	<p>This potentially is significant, because it is COMPETITION that is the necessary condition - the guarantor - of the other values (consumer trust and consumer choice) that ICANN seeks to advance and evaluate. And it was ICANN's inability to provide a sufficient competitive justification for its gTLD expansion that has drawn the fire of many stakeholders, including the U.S. Departments of Commerce and Justice. The existence of genuine competition - properly defined and understood - is a NECESSARY condition for the realization of consumer trust, consumer choice and innovation. It should be the primary concern.</p> <p>.....</p> <p>"Competition" can be assessed only within the context of a properly defined "relevant product market", as that term is understood by economists, competition authorities and the courts, to comprise the products (and their producers) that are deemed by consumers to be acceptable substitutes, and to exclude those products that are not seen as potential substitutes. "Competition" occurs only between and among goods (including services) that are substitutes; producers of COMPLEMENTARY goods do not "compete" with each other.</p>			
48.	<p>ICANN should follow up on the suggestion by Dennis Carlton—a leading authority on competition economics that ICANN itself hired by ICANN to assess the economic impact of the proposed new gTLDs—that the competitive significance of the new gTLDs should be measured by their success in competition with .com, .net and .org for new registrants of second-level domains, and that this could be done for the gTLDs (such as .biz, .info, and others) introduced by ICANN since 2000.</p> <p>.....</p> <p>He[Dennis] argued, the best evidence of the “competition” generated by new gTLDs would be their ability to induce de novo (i.e., “new”) second-level domain registrants to register under one of their new gTLDs, rather than .com, .net or .org.</p>	Michael Flynn/Public Comment	Reply Comments of Michael Flynn re Competition.pdf	
49.	<p>“Competition is defined as the quantity, diversity, and the potential for market rivalry of TLDs, TLD registry operators, and</p>	Michael Flynn/Public	Reply Comments of Michael Flynn re Competition.pdf	

	Comment	Who / Where	WG Response	Recommended Action
	registrars.” I have no idea where this came from. But as stated, it’s naïve, incomplete and unhelpful. An increase in the number of gTLDs hoping to sell second-level domains to registrants does not—in and of itself—amount to an increase in competition. And please, what does “potential for market rivalry” mean?	Comment		
50.	Definition of “Competition”. Similar to our concern with the definition of “Consumer Choice”, we are concerned that the definition of “Competition” focuses solely on the diversity of and marketplace for TLDs, and not competition on the Internet itself. The proper focus for competition is more than just an increase in domain names and registries. The quality of competition resulting from the new gTLDs should also be taken into consideration in the proposed analysis. For instance, there should be an analysis of the number of deadlinks and redirects of second-level domain names in newly delegated TLDs. Development of baseline values. The CTWG Advice requests that the ICANN staff “develop baseline values for any measure that applies to the pre-expansion gTLD space, so that future targets can be stated in terms of improvements relative to present performance.” First, we are somewhat concerned that the request only refers to staff developing a baseline which can be used to show “improvements relative to present performance.” This presupposes that there must be improvement and could be taken at a later time as evidence of bias in both the metrics and baseline values. We believe it would be better if “improvements” were changed to read “changes” or some similar, nonbiased term. Second, in order to be meaningful, both the baseline values and the statistics used in the metrics must be based on empirically similar data and utilize the same means for determining and comparing the data. This should be expressly noted in both the request to the staff and advice.	INTA / Public Comment	INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf	
51.	We also compliment the CCM WG on its recognition of the complete competitive landscape. In the definition on page 5, Note 4, the WG states: “ <i>The definition of Competition looks at</i>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc	

	Comment	Who / Where	WG Response	Recommended Action
	<p><i>all TLDs, not just gTLDs. The working group recognizes that ccTLDs are competitors to gTLDs, particularly where the ccTLD is marketed to registrants around the world (e.g. .me and .co)."</i></p> <p>However, we note that there is only one metric that includes ccTLDs (see the first metric under Competition on page 11). We would welcome further metrics in order to recognize this issue more fully.</p>			
Competition - Metrics				
52.	<p>Absolute number and growth rate of registrations of new gTLDs as a group, compared to registrations of the 21 earlier gTLDs as a group. Are both groups increasing in registrations? At what relative rates are they growing? Launch phase success vs. on-going growth? Adjustments can be made for global population and Internet penetration figures, perhaps also adjusted to relative launch eras to form a study of the two groups: the performance of new gTLDs and the performance of former gTLDs, instead of looking at individual TLDs.</p>	Annalisa Roger/Public Comment	New	
53.	<p>Percentage of new gTLD applications in both standard and community application groups that were submitted and were able to pass evaluations (by remaining in their designations).</p> <p>Percentage of new gTLD applications in standard, community, and brand application groups that met with considerable objection, and how often the objections prevailed.</p>	Annalisa Roger/Public Comment	New	
54.	<p>Compare many groups of applicants regarding *long term *success of new gTLDs delegated. This may measure the importance and relevance of components of the program that could influence the long term success of new gTLDs. Groups to be tracked might be described as how they won delegation:</p> <ul style="list-style-type: none"> • The winners of duplicate new gTLD applications that passed technical and financial evaluations, passed public objections, and won their delegation through the auction process. • The group of successful community applicants who won delegation over a standard applicant of the same string due 	Annalisa Roger/Public Comment	New	

	Comment	Who / Where	WG Response	Recommended Action
	<p>to their application community status.</p> <ul style="list-style-type: none"> • A group comprised of single applicants of a string who made it to the first batch. (tougher odds than strings with multiple applicants with multiple chances to enter the first batch.) • How many in each group received the most public objections? • How many strings with at least one successful application made it to launch? • What is the number of successful strings who didn't make it to launch? • Which batches produced to most of each of the above two groups? 			
55.	<p>The proposed measures naively regard an increase in the number of supposed rivals for the business of a second-level domain registrant as the equivalent of an increase in "competition".</p> <p>.....</p> <p>A simplistic count of the number of gTLD rivals for a would-be registrant's business is not an economically meaningful measure of the "competition"—if any—among the gTLDs the registrant faces. It follows that an increase in the number of such rivals for a registrant's business does not amount to increased "competition".</p> <p>The proposed measures assume that would-be registrants of second-level domains regard all unsponsored gTLDs (as well as some ccTLDs) as actual or potential substitutes.</p> <p>.....</p> <p>Before undertaking to measure anything, what is needed first is a complete, professional delineation of the "relevant product market(s)" that are at issue, including a determination of which gTLDs (and ccTLDs, if any) are economic substitutes and which are complements, as seen by would-be registrants.</p>	Michael Flynn/Public Comment	Reply Comments of Michael Flynn re Competition.pdf Advice Ltr - (p.10, metrics #1-4+)	
56.	<p>The total number of second-level domains registered under that gTLD.</p> <ul style="list-style-type: none"> • The total number of second-level domains that are unique to that gTLD. • The total web traffic (measured, say, by the number of unique 	Michael Flynn/Public Comment	Reply Comments of Michael Flynn re Competition.pdf Advice Ltr - (p.10, metrics #1-4+)	

	Comment	Who / Where	WG Response	Recommended Action
	visitors per time period) that is generated by all of the second-level domains registered under that gTLD. The proposed measures of competition fail to recognize that ICANN's imminent introduction of new gTLDs likely will increase—not reduce—the market power of some gTLDs.			
57.	In fact, all of the Measures of Competition (including Innovation) that finally are adopted should be applied immediately—without waiting for the accumulation of one year's experience under the latest gTLDs—to ICANN's two earlier gTLD expansions. This would accomplish three things: First, it would provide the "snapshot" of the gTLD system "prior to the launch of the new gTLDs", as proposed by the INTA.3 Second, it would allow the testing (and refinement, if indicated) of the proposed Measures of Competition (and Innovation), using actual, currently available data on the past decade's new gTLDs (that ICANN also claimed would increase competition and innovation). Third, it would provide immediate evidence bearing on the likelihood that ICANN's claims in support of its most recent gTLD expansion will be vindicated.	Michael Flynn/Public Comment	Reply Comments of Michael Flynn re Competition.pdf	
58.	Quantity of total TLDs before and after expansion, assuming that gTLDs and ccTLDs generally compete for the same registrants In addition to the number of TLDs before and after expansion, there should be an accounting of the number of second-level domains in each new gTLD, and of those second-level registrations, how they are used (e.g., redirected to registrations in legacy TLDs, inactive or dead, or parked pages -- anything that resolves to a page that says parked or that is simply advertising links).	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf (p.11, metrics #1)	
59.	Quantity of unique gTLD Registry Operators before and after expansion 2x seems low. We believe this metric would only measure the	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf (p.11, metrics #3)	

	Comment	Who / Where	WG Response	Recommended Action
	expansion of the DN space, not the extent to which actual competition increased. We suggest the following target: “Ratio of unique gTLD registry operators (i.e. operators who own only one gTLD) to total number of gTLDs before expansion and after expansion, should at least double at 1 year and three years from expansion.”			
60.	<p>Quantity of unique gTLD Registry Service Providers before and after expansion</p> <p>2x seems low. We believe this metric would only measure the expansion of the DN space, not the extent to which actual competition increased. We suggest the following target: “Ratio of unique gTLD registration Service Providers (i.e. operators who own only one gTLD) to total number of gTLDs before expansion and after expansion, should at least double at 1 year and three years from expansion.”</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf (p.11, metrics #4)	
61.	<p>Relative share of new gTLD registrations held by “new entrants”. For purposes of this measure, “new entrants” are gTLDs run by Registry Operators that did not operate a legacy gTLD.</p> <p>We believe this metric might not adequately measure the expansion of the DN space nor the extent to which actual competition has increased, it also appears to be quite low a target. We suggest the following target: “Number of gTLDs owned by new entrants should represent more than 85% of total new gTLD registrations.”</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf (p.11, metrics #6)	
62.	<p>Wholesale price of new gTLD domains offered to the general public. (do not evaluate gTLDs with registrant restrictions).</p> <p>3 Yr. Target: No target; compare Comparison to 2011 and to unrestricted legacy gTLDs – prices after expansion should decrease.</p> <p>Essential that comparative information be obtained before expansion, as well as at 1 and 3 years after expansion. If possible, a survey of prices from before the announcement of the expansion (i.e. prior to June 20, 2011) should also be obtained and compared. While lack of</p>	INTA / Public Comment	INTA Internet Committee comments on Metrics Chart 17 Apr 2012.pdf (p.11, metrics #7, 8)	

	Comment	Who / Where	WG Response	Recommended Action
	target is understandable, we believe the sign of completion would be a steady decrease in price, and this is generally what should be targeted to determine success.			
63.	<p>While I think the definition of competition offered by the Working Group is adequate, the measures that are then offered fail to reflect fully the benefits of competition. The measures outlined on page 11 of the Draft Report focus on market share and price impacts. But the economic literature on the benefits of competition also stresses its role in driving innovation and the emergence of improved or new products and services.</p> <p>The US Federal Communications Commission outlines this economic analysis pithily: "Free and open competition benefits individual consumers and the global community by ensuring lower prices, new and better products and services, and greater consumer choice than occurs under monopoly conditions. In an open market, producers compete to win customers by lowering prices, developing new services that best meet the needs of customers. A competitive market promotes innovation by rewarding producers that invent, develop, and introduce new and innovative products and production processes. By doing so, the wealth of the society as a whole is increased." / (Connecting the Globe: V. Competition in Telecommunications/ www.fcc.gov/connectglobe/sec5.html)</p> <p>I strongly recommend that the Working Group develop some measures which focus on innovation and on new products or services. In my mind, one example of the innovation benefits of the previous rounds of introducing new gTLDs is the new use of the DNS by .tel(although I recognize it was not initially welcomed by all members of the technical community). While the TLD is controversial for other reasons, the representation and warranty provisions of registration under .xxx (relating to invalidation if for use or promotion of certain</p>	Dr. Paul Twomey / Public Comment	(p.11, metrics #ALL) New	

	Comment	Who / Where	WG Response	Recommended Action
	<p>"illegal purposes") may also be another example. Limiting registration to ensure authoritative expression of identity, as is the case in .cat, is another.</p> <p>These are benefits which may benefit various and smaller segments of the user base. This is a valid outcome of competition. Indeed, one of the positive outcomes of open, competitive markets is the focus of producers on the needs of more specific segments of the broader consumer base. Monopoly markets tend to talk of users; competitive markets tend to talk of market segments. The measurement of competition should also seek to capture that development.</p>			
64.	<p>Chuck Gomes – “Quantity of unique gTLD Registry Service Providers before and after expansion” – is ccTLD operator becoming a gTLD provider counted? If you include ccTLD operators, just be clear on it. Affects reality of the goal</p> <ul style="list-style-type: none"> • Bruce Tonkin – Macro view of organization and talking about market place. Whole market place is one review, 2nd review is the gTLD market place. 	Chuck Gomes / Costa Rica Session		
General Comments				
65.	<p>In addition, ICANN should develop mechanisms with law enforcement and the GAC that will allow the prosecution and punishment of rampant cyber criminals that are increasingly brazen in their email spoofing, spamming, database infiltration, and malware downloads. While CBBB recognizes the need for an unencumbered Internet space, free from excessive regulatory control, there does need to be significant international prosecution of e-commerce crime and fraud that is taking place on the Internet.</p>	CBBB/Public Comment		
66.	<p>In my opinion, the most important measures of success demonstrate service to the global Internet community. Are there accessible choices for Internet users with a wide range of options such as IDNs, communities, industry-specific options, easy to remember TLDs, and identifiable TLDs that benefit people in some way? Do new gTLDs invite global Internet users, no matter who they are and where they live, to feel the</p>	Annalisa Roger/Public Comment		

	Comment	Who / Where	WG Response	Recommended Action
	<p>Internet can serve them in a familiar and friendly manner, bringing them ideas, innovation, advancement, economic opportunity, and a better life?</p> <p>The new gTLD program should also be measured for success if executing its program for global multi-stake holders turned out new gTLD delegations from applicants representing the makeup of a global population of men and women, Corporates and NGOs, Civil Societies and Business Associations. And given the ICANN global multi-stakeholder process, were all of ICANN's five regions of the world and multiple languages represented? Future ICANN meetings should benefit from all its new gTLD registry and industry members and they should be encouraged to join the global multi-stakeholder processes of policy and governance going forward.</p>			
67.	<p>We compliment the CCM WG on the broad definition included in the first full paragraph on page 3 as follows: ". . . a full examination of choice should not only measure the diversity within registries and registrars, but also examine options that allow users to avoid direct use of the DNS altogether. Alternate methods of accessing Internet content and services (mobile apps, search engines, social portals, QR codes, etc.) are growing in popularity and themselves present innovative and competitive threats to ICANN-regulated TLDs. As such, they should be considered in any complete evaluation of consumer choice and trust related to ICANN in general and new gTLDs specifically." However, we also suggest that additional metrics be developed to ensure that this point is not overlooked in the evaluation.</p>	RYSG / Public Comment	RySG Comments Consumer_Trust,_Choice_&Competition Final.doc	

- **Page xx** – USG
- **Page xx** – SPAM
- **Page xx** – The Council of Better Business Bureaus (CBBB)
- **Page xx** – Annalisa Roger, Founder/CEO, DotGreen Community, Inc.
- **Page xx** – Michael A. Flynn, Director, AFE Consulting
- **Page xx** – Claudio DiGangi, Manager, External Relations, INTA Internet Committee
- **Page xx** – ALAC
- **Page xx** – RYSG
- **Page xx** – Dr. Paul Twomey, Managing Director, Argo P@cific
- **Page xx** – Costa Rica Public Session Comments

United States Government Comments - "Advice requested by ICANN Board regarding definitions, measures, and targets for competition, consumer trust and consumer choice"

- *To:* "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* United States Government Comments - "Advice requested by ICANN Board regarding definitions, measures, and targets for competition, consumer trust and consumer choice"
- *From:* "Vernita D. Harris" <vharris@xxxxxxxxxxxx>
- *Date:* Tue, 15 May 2012 16:09:14 -0400

Enclosed are the comments of the United States Government on the various proposals included in the February 22, 2012, draft "Advice requested by ICANN Board regarding definitions, measures, and targets for competition, consumer trust and consumer choice, prepared by the Generic Names Supporting Organization (GNSO) Council's Consumer Trust, Choice, and Competition Working Group."

Vernita

Vernita D. Harris

Deputy Associate Administrator | Contracting Officer's Representative

Office of International Affairs | NTIA | U.S. Department of Commerce

Penguin Proof Link Pyramid

- *To:* "cctc-draft-advice-letter" <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* Penguin Proof Link Pyramid
- *From:* "Rose Byrd" <rosec.byrd@xxxxxxxx>
- *Date:* Fri, 4 May 2012 02:03:23 +0300

Hello Friend,

<< SPAM >>

Date: Tue, 17 Apr 2012 19:40:36 -0400

comments

- *To:* <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* comments
- *From:* "Anjali K. Hansen" <anjali@xxxxxxxxxxxxxxxxxxxx>
- *Date:* Tue, 17 Apr 2012 19:40:36 -0400

The Council of Better Business Bureaus (CBBB) would like to comment on the ICANN Board request for definitions, measures, and targets for competition, consumer trust and consumer choice.

CBBB concurs with the recommendations of the Consumer Trust Working Group for ALAC, ccNSO, and GNSO and would like to provide the context for its views in support of the Consumer Trust Working Group.

As CBBB has stated prior to the opening of the new gTLD application period, there is far too little control over the rampant crime that takes place via the Internet in the form of pirating of intellectual property, identity theft, phishing scams and other types of brand infringement and consumer fraud. CBBB and its constituents - small and medium business, nonprofits and consumers - are victimized by Internet crime on a daily basis.

CBBB believes that tracking of these issues via the metrics and methods set forth by the Consumer Trust Working Group will be essential. In particular, CBBB requests that the costs of trademark abuse be tracked by calculating the number of defensive registrations that will follow in the new gTLD registries, as well as calculating the number of blocking of trademarks that will occur during sunrise periods in the new gTLDs. Such costs are adverse to the public interest and ultimately consumers. To minimize such costs, CBBB strongly urges ICANN to put in place a central trademark clearinghouse for valid trademark holders to block registries and registrars from sales of such valid trademarks to registrants. This will reduce the amount of profiteering that has taken place in the past when registrars are allowed to sell others' trademarks, which

does nothing to increase competition on the Internet. ICANN has essentially allowed the blatant violation of others trademark rights for too long and if it continues to allow this, it should document the amount of such illegal activity.

Comment [bac2]: Added to Consumer Trust / Metrics

In addition, ICANN should develop mechanisms with law enforcement and the GAC that will allow the prosecution and punishment of rampant cyber criminals that are increasingly brazen in their email spoofing, spamming, database infiltration, and malware downloads. While CBBB recognizes the need for an unencumbered Internet space, free from excessive regulatory control, there does need to be significant international prosecution of e-commerce crime and fraud that is taking place on the Internet.

Comment [bac3]: Added to General Comments

If there is to be consumer trust on the Internet, there needs to be meaningful consumer protection.

Sincerely,

Anjali Karina Hansen

Associate General Counsel

Council of Better Business Bureaus

Date: Tue, 17 Apr 2012 16:19:01 -0700

Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition

- *To:* cctc-draft-advice-letter@xxxxxxxx
- *Subject:* Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition
- *From:* Annalisa Roger <annalisaroger@xxxxxxxxxxxx>
- *Date:* Tue, 17 Apr 2012 16:19:01 -0700

*
*
**

Thank you for this opportunity to post comments to the Consumer Trust Working Group, as I believe the work prepared by this group is very important for the review process that will follow the launch of new gTLDs. I wish to recommend the search for measurements to depict areas of success realized by both the new gTLD program.

Suggestions of metrics to measure:

Geographic diversity of registrants actually using the new gTLDs. Is there widespread adoption of new gTLDs in regions around the world that are representative of the Internet's reach? Has the program been accepted and understood across the regions? Is there evidence that new gTLDs (as a general group) are being registered and used across the world? (Note: this is different that diversity in who is managing the new gTLDs)

Ability of new gTLDs to empower communities, regions, brands and people. Consider doing a study of a group of communities (around delegated new gTLD strings) before and after they launch their gTLD, compared to similar communities who do not have gTLDs strings.

Absolute number and growth rate of registrations of new gTLDs as a group, compared to registrations of the 21 earlier gTLDs as a group. Are both groups increasing in registrations? At what relative rates are they growing? Launch phase success vs. on-going growth? Adjustments can be

Comment [bac4]: Added to Consumer Choice metrics

made for global population and Internet penetration figures, perhaps also adjusted to relative launch eras to form a study of the two groups: the performance of new gTLDs and the performance of former gTLDs, instead of looking at individual TLDs.

Comment [bac5]: Added to Competition Metrics

• Internet user and registrant behaviors around two groups: the former gTLDs and the new gTLDs. The new implementations, safeguards and protective mechanisms introduced in the new gTLD program could be monitored in various ways to calculate the incidences of malicious activity, trademark infringements, etc.

Comment [bac6]: No specific measurement here, Encapsulated within the Consumer Trust section

• Percentage of new gTLD applications in both standard and community application groups that were submitted and were able to pass evaluations (by remaining in their designations).

• Percentage of new gTLD applications in standard, community, and brand application groups that met with considerable objection, and how often the objections prevailed.

Comment [bac7]: Added to Competition metrics

• Compare many groups of applicants regarding *long term *success of new gTLDs delegated. This may measure the importance and relevance of components of the program that could influence the long term success of new gTLDs. Groups to be tracked might be described as how they won delegation:

- The winners of duplicate new gTLD applications that passed technical and financial evaluations, passed public objections, and won their delegation through the auction process.
- The group of successful community applicants who won delegation over a standard applicant of the same string due to their application community status.
- A group comprised of single applicants of a string who made it to the first batch. (tougher odds than strings with multiple applicants with multiple chances to enter the first batch.)
- How many in each group received the most public objections?
- How many strings with at least one successful application made it to launch?
- What is the number of successful strings who didn't make it to launch?
- Which batches produced to most of each of the above two groups?

Comment [bac8]: Added to Competition Metrics

In my opinion, the most important measures of success demonstrate service to the global Internet community. Are there accessible choices for Internet users with a wide range of options such as IDNs, communities, industry-specific options, easy to remember TLDs, and identifiable TLDs that benefit people in some way? Do new gTLDs invite global Internet

users, no matter who they are and where they live, to feel the Internet can serve them in a familiar and friendly manner, bringing them ideas, innovation, advancement, economic opportunity, and a better life?

The new gTLD program should also be measured for success if executing its program for global multi-stake holders turned out new gTLD delegations from applicants representing the makeup of a global population of men and women, Corporates and NGOs, Civil Societies and Business Associations. And given the ICANN global multi-stakeholder process, were all of ICANN's five regions of the world and multiple languages represented? Future ICANN meetings should benefit from all its new gTLD registry and industry members and they should be encouraged to join the global multi-stakeholder processes of policy and governance going forward.

Sincerely,

Annalisa Roger, Founder/CEO
DotGreen Community, Inc.
www.dotgreen.org

Comment [bac9]: Added to General comments

Date: Tue, 17 Apr 2012 22:58:26 +0000

The proposed Measures of Competition are economically meaningless

- ~~• To: "ectc-draft-advice-letter@xxxxxxxx" <ectc-draft-advice-letter@xxxxxxxx>~~
- ~~• Subject: The proposed Measures of Competition are economically meaningless~~
- ~~• From: Michael Flynn <MFlynn@xxxxxxxxxxxxxx>~~
- ~~• Date: Tue, 17 Apr 2012 22:58:26 +0000~~

~~— The proposed definitions, measures and targets are completely inappropriate for assessing competition.~~

~~— Between the final draft (dated 22 February 2012) of the Advice Letter and ICANN's February 23rd posting, there was an interesting switch in emphasis that suggests ICANN now is trying to minimize the role of competition as a justification. The title of the final draft ("Advice requested by ICANN Board regarding definitions, measures, and targets for competition, consumer trust and consumer choice" became "Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition"[emphases added]~~

~~— This potentially is significant, because it is competition that is the necessary condition the guarantor of the other values that ICANN claims to be promoting. It was ICANN's inability to provide a sufficient competitive justification for its expansion plans that has drawn the fire of many, including the U.S. Departments of Commerce and Justice. The existence of competition properly defined and understood is a necessary condition for the realization of consumer trust, consumer choice and innovation. It should be the primary concern.~~

~~— But vague invocations of "competition", without more, are meaningless, just as are its purported definition ("Competition is defined as the quantity, diversity, and the potential for market rivalry of TLDs, TLD registry operators, and registrars") and the "Measures of Competition" that have been advanced at p. 11 by ICANN.~~

~~— "Competition" can be assessed only within the context of a properly defined "relevant product market", as that term is understood by economists, competition authorities and the courts to comprise the products (and their producers) that are deemed by consumers to be acceptable substitutes, and to exclude those products that are not so perceived. "Competition" occurs only between and among goods (including services) that are substitutes; producers of complementary goods do not compete with each other in any meaningful sense.~~

~~———— This is not just relevant to any discussion of "definitions, measures, and targets" for "competition"; it's critical.~~

~~The fundamental flaw in ICANN's entire rationale for its plans to increase in number of gTLDs is that it has never offered any satisfactory analysis of the threshold question: Do gTLDs even compete with each other? Put differently, does ICANN or anyone else seriously contend that registrants of second level domains generally are content to register their domains under one and only one of the available gTLDs, and that they are largely indifferent as to which they align with?~~

~~To anyone familiar with the actual demand by registrants of second level domains, the question answers itself: These registrants overwhelmingly prefer the .com gTLD. To the extent they undertake registrations under any of the other gTLDs, it is in addition to their .com domains. In other words, these registrations under the other non .com gTLDs are complements rather than substitutes that are generally undertaken for defensive purposes. Despite the prodding of U.S. government agencies and others, ICANN has never undertaken a proper delineation of the relevant product markets at issue in connection with its three campaigns (in 2000, 2003-2004 and the present). Its currently proposed measures of "competition" reflect that failure. They are meaningless, because they are not based on a clear delineation of the economic markets relevant to gTLDs.~~

~~Michael A. Flynn
Director~~

- ~~• To: "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>~~
- ~~• Subject: The proposed Measures of Competition are economically meaningless [CORRECTED]~~
- ~~• From: Michael Flynn <MFlynn@xxxxxxxxxxxxxxxx>~~
- ~~• Date: Wed, 18 Apr 2012 13:58:18 +0000~~

The proposed definitions, measures and targets are largely inappropriate and unhelpful for assessing competition. Moreover, ICANN now appears to be deemphasizing competition itself as a criterion when reviewing the performance of the new gTLDs.

Between the final draft (dated 22 February 2012) of the Advice Letter and ICANN's February 23rd posting, there was an interesting switch in emphasis that suggests ICANN now is trying to minimize the role of competition as a justification for introducing new gTLDs. The title of the final draft ("Advice requested by ICANN Board regarding definitions, measures, and targets for COMPETITION, consumer trust and consumer choice" has now become "Draft Advice Letter on Consumer Trust, Consumer Choice, and COMPETITION [emphases added]

This potentially is significant, because it is COMPETITION that is the

necessary condition - the guarantor - of the other values (consumer trust and consumer choice) that ICANN seeks to advance and evaluate. And it was ICANN's inability to provide a sufficient competitive justification for its gTLD expansion that has drawn the fire of many stakeholders, including the U.S. Departments of Commerce and Justice. The existence of genuine competition - properly defined and understood - is a NECESSARY condition for the realization of consumer trust, consumer choice and innovation. It should be the primary concern.

But vague invocations of "competition", without more, are economically meaningless. So also are the definition supplied for it ("Competition is defined as the quantity, diversity, and the potential for market rivalry of TLDs, TLD registry operators, and registrars") and the "Measures of Competition" that have been proposed at p. 11.

"Competition" can be assessed only within the context of a properly defined "relevant product market", as that term is understood by economists, competition authorities and the courts, to comprise the products (and their producers) that are deemed by consumers to be acceptable substitutes, and to exclude those products that are not seen as potential substitutes.

"Competition" occurs only between and among goods (including services) that are substitutes; producers of COMPLEMENTARY goods do not "compete" with each other.

This is not just relevant to any discussion of "definitions, measures, and targets" for "competition"; it's critical. Unless restricted to just those alternatives that have been shown to be economic substitutes, such measurements would be meaningless.

The fundamental flaw in ICANN's entire rationale for its plans to increase in number of gTLDs is that it has never offered any satisfactory analysis or answer for the threshold question: Do gTLDs actually compete with each other? Put differently, does ICANN - or anyone else - seriously contend that registrants of second-level domains generally are content to register their domains under one - and only one - of the available gTLDs?

To anyone familiar with the actual demand by registrants of second-level domains, the question answers itself: Most registrants overwhelmingly prefer to register their second-level domains under the .com gTLD. To the extent they undertake registrations under any of the other gTLDs, this is IN ADDITION TO their .com domains, usually for defensive reasons. In other words, these registrations under the other non-.com gTLDs are COMPLEMENTS rather than SUBSTITUTES.

Despite prodding by U.S. government agencies and others, ICANN has never been willing to undertake a proper delineation of the relevant product markets at issue in connection with any of its three campaigns (in 2000, 2003-2004 and the present) to increase the number of gTLDs. Its currently proposed measures of "competition" reflect that failure. They are economically meaningless, because they would not be taken within the confines of a properly-defined relevant product market. As a result, they cannot provide meaningful measures of the competitive significance of the new gTLDs, and likely will wrongly suggest that some new gTLDs have enhanced competition when in reality they have done nothing

Comment [bac10]: Added to Competition Definition

Comment [bac11]: Added to Competition Definition

of the sort.

Michael A. Flynn
Director

[AFEConsultingLogo021411-1000 Small.JPG]

AFE Consulting
1999 Harrison Street, Suite 2700
Oakland, California 94612

Please substitute this .pdf file for the .bin version posted earlier

- *To:* "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* Please substitute this .pdf file for the .bin version posted earlier
- *From:* Michael Flynn <MFlynn@xxxxxxxxxxxxxxxx>
- *Date:* Wed, 9 May 2012 05:19:11 +0000

Michael A. Flynn
Director

[AFEConsultingLogo021411-1000 Small.JPG]

AFE Consulting
1999 Harrison Street, Suite 2700
Oakland, California 94612

Attachment: [Reply Comments of Michael Flynn re Competition.pdf](#)

Description: **Reply Comments of Michael Flynn re Competition.pdf**

Comment [bac12]: Rationale not added to Summary matrix to minimize length.

Comment [bac13]: Refer to comments in PDF attachment

Date: Tue, 17 Apr 2012 17:38:48 -0400

Comments of the INTA Internet Committee

- ~~• To: "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>~~
- ~~• Subject: Comments of the INTA Internet Committee~~
- ~~• From: Claudio Di Gangi <cdigangi@xxxxxxxx>~~
- ~~• Date: Tue, 17 Apr 2012 17:38:48 -0400~~

~~Please find attached the comments of the INTA Internet Committee.~~

~~Respectfully submitted,~~

~~Claudio DiGangi
Manager, External Relations~~

~~**Attachment:** [INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf](#)~~

~~Description: INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf~~

~~**Attachment:** [INTA Internet Committee comments on Metrics Chart.docx](#)~~

~~Description: INTA Internet Committee comments on Metrics Chart.docx~~

Resubmitted comments of the INTA Internet Committee

- To: "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>
- Subject: Resubmitted comments of the INTA Internet Committee
- From: Claudio Di Gangi <cdigangi@xxxxxxxx>
- Date: Tue, 17 Apr 2012 21:40:52 -0400

This is to resubmit the comments of the INTA Internet Committee.

Respectfully,

Claudio DiGangi
Manager, External Relations

Attachment: [INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf](#)

Description: INTA Internet Committee Comments on Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf

Attachment: [INTA Internet Committee comments on Metrics Chart.pdf](#)

Description: INTA Internet Committee comments on Metrics Chart.pdf

Comment [bac14]: Refer to comments in attached INTA PDFs

Date: Tue, 17 Apr 2012 13:56:55 -0700

ALAC Statement on the Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition

- *To:* "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* ALAC Statement on the Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition
- *From:* ICANN At-Large Staff <staff@xxxxxxxxxxxxxxxxxxxx>
- *Date:* Tue, 17 Apr 2012 13:56:55 -0700

Dear All,

Please find attached the ALAC Statement on the Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.

Please note that the document is currently undergoing ALAC ratification, with the vote having already achieved quorum in favor of passing the Statement. We will be updating you with a final vote count once the vote is closed.

Regards,

Heidi Ullrich, Silvia Vivanco, Matt Ashtiani, Gisella Gruber, and Nathalie Peregrine
ICANN Policy Staff in support of ALAC

See: ALAC Statement on the Draft Advice Letter on Consumer Trust, Consumer Choice, and Competition.pdf

Comment [bac15]: Refer to attached PDF for comments

Date: Mon, 16 Apr 2012 10:01:52 -0400

RySg Comments - Draft Advice Letter on Consumer Trust, Consumer Choice and Competition

- *To:* "cctc-draft-advice-letter@xxxxxxxx" <cctc-draft-advice-letter@xxxxxxxx>
- *Subject:* RySg Comments - Draft Advice Letter on Consumer Trust, Consumer Choice and Competition
- *From:* "David W. Maher" <dmaher@xxxxxxxx>
- *Date:* Mon, 16 Apr 2012 10:01:52 -0400

On behalf of the Registries Stakeholder Group (RySG), attached please find the comments of the Stakeholder Group on the Draft Advice Letter on Consumer Trust, Consumer Choice and Competition. These comments have the support of a majority of the members of the Stakeholder Group.
Respectfully submitted,

David W. Maher
Chair, Registries Stakeholder Group
Senior Vice President - Law & Policy
Public Interest Registry

See:

[RySG Comments Consumer_Trust,_Choice_&Competition Final.doc](#)

Comment [bac16]: Refer to attached Word doc for comments

Date: Sat, 25 Feb 2012 09:28:00 +1100

Expand the measurement of Competition to include impacts on innovation

- *To:* cctc-draft-advice-letter@xxxxxxxx
- *Subject:* Expand the measurement of Competition to include impacts on innovation
- *From:* Paul Twomey <paul.twomey@xxxxxxxxxxxxxxxx>
- *Date:* Sat, 25 Feb 2012 09:28:00 +1100

I congratulate the Consumer Trust Working Group on their important work.

I wish to make one observation, related particularly to the benefits and measurement of competition.

While I think the definition of competition offered by the Working Group is adequate, the measures that are then offered fail to reflect fully the benefits of competition.

The measures outlined on page 11 of the Draft Report focus on market share and price impacts.

But the economic literature on the benefits of competition also stresses its role in driving innovation and the emergence of improved or new products and services.

The US Federal Communications Commission outlines this economic analysis pithily:

"Free and open competition benefits individual consumers and the global community by ensuring lower prices, new and better products and services, and greater consumer choice than occurs under monopoly conditions. In an open market, producers compete to win customers by lowering prices, developing new services that best meet the needs of customers. A competitive market promotes innovation by rewarding producers that invent, develop, and introduce new and innovative products and production processes. By doing so, the wealth of the society as a whole is increased." /(Connecting the Globe: V. Competition in Telecommunications/ www.fcc.gov/connectglobe/sec5.html)

I strongly recommend that the Working Group develop some measures which focus on innovation and on new products or services.

In my mind, one example of the innovation benefits of the previous rounds of introducing new gTLDs is the new use of the DNS by .tel (although I recognize it was not initially welcomed by all members of the technical community).

While the TLD is controversial for other reasons, the representation and warranty provisions of registration under .xxx (relating to invalidation if for use or promotion of certain "illegal purposes") may also be another example.

Limiting registration to ensure authoritative expression of identity, as is the case in .cat, is another.

These are benefits which may benefit various and smaller segments of the user base. This is a valid outcome of competition. Indeed, one of the positive outcomes of open, competitive markets is the focus of producers on the needs of more specific segments of the broader consumer base. Monopoly markets tend to talk of users; competitive markets tend to talk of market segments. The measurement of competition should also seek to capture that development.

I look forward to the Working Group considering this comment, and developing further measures of competition.

Your sincerely,

Paul

--

Dr Paul Twomey
Managing Director
Argo P@cific

Comment [bac17]: Added to the Competitions Measures Section

Consumer Metrics – Costa Rica Public Session Feedback Summary

Consumer Trust

- Definition of
 - Bruce Tonkin – degree of consistency in how the 2nd level names are being used – consumer experiences how the names are used
 - Shandra Locke – Definition is not broad enough, issue that ICANN Policy & Applicable Laws does not directly apply Consumer Trust.
 - Jonathan Zuck – Maybe working definitions change, utmost important to internet users. Function as to what Registries are offering out to the world.
 - Ray Fassett - .job – Define CT in context of new gTLDs. Definition on screen is not same on screen vs, draft letter. Refers to AGB Q18 application. Stay away from subjective words and what is your mission purpose. Promises as referred to in Consumer Metrics should refer to Q18 of AGB
 - Expanding context of the definition
 - Evan Lebovitch – Acknowledged limitation of scope within ICANN vs. consideration of other access forms for Internet. In context of Consumer Trust & Choice
 - Rudi Vansnick: <question> TRUST is a very flexible word : several definitions can be attributed but at the end, what does a consumer get in return if he/she trusts the other party ? Look at how registrants are handled by registrars. Do we need different types of TRUST ?</question>
- Metrics
 - Chuck Gomes – Page 7 Metrics – “Relative incidence of notices issued to Registry operators, for contract or policy compliance matters” + or – 5% of Legacy gTLDs – being unfair for new gTLDs due to more variation versus legacy TLDs having the advantage Unfair for new player to have too high of standards
- Misc:
 - Ray Fassett – Effect of consumer trust if ICANN should interfere
 - Jonathon Robinson – Useful perspective for ICANN to fulfill their promise; ICANN is a party

Consumer

- GPM Group: Distinguish between consumer registrants vs professional registrants

Consumer Choice

- Andy Mack – Outreach necessary to urge ICANN to spread the word more, and somehow measure that. No explicit measures of communications program. If we wait two to three years down the line. Andy to provide metric
 - Jonathon Zuck – Aim Andy’s question to Bruce – How ICANN might manage these metrics?

Comment [bac18]: Consumer Expectation, WG took narrow scope.

Comment [bac19]: Threshold issue to cover things outside of scope of ICANN policy – Point to survey of CT to measure consumer’s confidence and things like malware.

Communicate better that we are just “measuring”, not acting upon relevant policy response.

Comment [bac20]: No Action

Comment [bac21]: Metrics are crucial in evaluating the definition

Comment [bac22]: How do measure, and does it encroach on our scope/threshold

Comment [bac23]: •Create two metrics for general complaints for Rr & Ry.

•<http://reports.internic.net/cgi/registrars/problem-report.cgi>

•Review Ombudsmen complaints.

•Briefing as to what requirements/whats possible within the new system.

•Review of existing ICANN Complaint system data by category to gauge consumer trust, legacy data vs new gTLDs

•New Measure CT: Complaints Rr handling, new vs legacy complaint; Source, ICANN; 3 yr target, Comparison of legacy vs new gTLD, rate of complaints

•Ry should be part of complaint system going fwd.

Comment [bac24]: More lenient with the targets; stating current TLDs have a good head start in positive behavior

CCTC Clarify how we do the math.

Comment [bac25]: Added to Matrix

Comment [bac26]: The definition address all types of registrants, and does not require the distinction

- Bruce Tonkin – ICANN Community accept the definitions of these terms. ICANN approve the policy that defines those terms. 2nd issue – Metrics – Cost of Delivering them; degree of resource implications; Targets part of strategic planning; Consumer Trust part of Strategic Plan; # of uses of Consumer is large. Should have a shared definition of Consumer
- Metrics:
 - Chuck Gomes – Equate sunrise registrations to defensive registrations.....Registrations by Rights Holders b/c they will use the name. IDN version of .com, brand will not register in scripts to defend, but to use. Not so complicated to measure but may provide false results
 - Steve DelBianco – might have to restrict this measure only TLDs open to general public...."redirected registrations"
 - Chuck Gomes – Redirected does not necessarily mean defensive either
 - Jonathan Zuck – Start tracking data. How it get interpreted and evaluated does not need to be pre-determined

Comment [bac27]: Incorporate Outreach/Awareness of new TLDs questions in to survey

Competition

- Metrics
 - Chuck Gomes – “Quantity of unique gTLD Registry Service Providers before and after expansion” – is ccTLD operator becoming a gTLD provider counted? If you include ccTLD operators, just be clear on it. Affects reality of the goal
 - Bruce Tonkin – Macro view of organization and talking about market place. Whole market place is one review, 2nd review is the gTLD market place.
 - Marilyn Cade - Increasing number of Registry Service providers and expanding geographic distribution of Ry & Rr

Comment [bac28]:
Determine criteria of defensive registrations, b/c sunrise may not necessarily mean a defensive registration, but 1st chance opportunity to acquire domain. Redirects do not necessarily mean redirect either. -Don't want to set aggressive 3yr. targets

Cross out (do not count privacy/proxy registrations) from first & second row on page 10. For Sunrise.

Comment [bac29]: Added to matrix