dotCities – The City Top-Level Domain Alliance

Comments to the Draft Applicant Guidebook

We, as the representatives of 5 city top-level domain (cityTLD) initiatives, would like to thank all the people that contributed, followed up and finalized the Draft Applicant Guidebook (Draft RFP). It is a fundamental document which will bring much greater reliability in the approval of new top-level domain (TLD), and it is a great step towards a fully accomplished mission of ICANN. The new TLD process will make it possible that our communities will be able to use their own identities on the top-level from next year.

Top-level domains for cities will become an important part of the development of the domain-name-system (DNS) in the future. cityTLDs are a reasonable expansion of the DNS, since city identity is one of the oldest, strongest and most popular ways that people identify themselves. Cities are global drivers of innovation and progress and will contain more than two-thirds of the world's population by 2030.

Detailed arguments for our comment points below have been circulated sufficiently within the community during the last years. Therefore we keep our comments on the Draft Applicant Guidebook brief:

Comment to Evaluation Fee and Annual Fees to ICANN

We think that the evaluation fee of US$185,000 and US$75,000 annual fees to ICANN are far too high because:

1. We expect that city top-level domain applicants with support by relevant government/s and/or public authority/ies will raise fewer issues in the application process.

2. We anticipate that high fees will cause harmful economic pressure on the cityTLDs, both in the application and operational phases.

Therefore we suggest lowering the evaluation fee for city top-level domains to US$50,000 and the minimum annual fee to US$15,000.

Comment to Timeline

We think that ICANN should adhere to the application timeline published with the Draft Applicant Guidebook.

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Comment to Subsequent Application Rounds

We think that ICANN should state in the Final Applicant Guidebook exact dates for the application submission window for this round, and a clearly defined date for next round.

General Comment on Policy Delegation in Community Applications

We think that the Applicant Guidebook should state that the policy authority and governance for community-based top-level domains should be delegated to the respective community.

Signatories

This document is supported and signed by the following cityTLD initiatives:

.bcn   .bcn - represented by Raquel Gisbert (Ajuntament de Barcelona), Marta Téllez (project manager) and Amadeu Abril i Abril (adviser)

.berlin   represented by the Dirk Krischenowski (founder and CEO of dotBERLIN GmbH & Co. KG)

.hamburg   represented by the Oliver Süme (founder and CEO of Initiative dotHamburg e.V.)

.nyc   represented by Antony Van Couvering (founder and CEO of Dot NYC LLC) and Thomas Lowenhaupt (founder and managing director of Connecting.nyc, Inc.)

.paris   represented by Eric Spitz (City of Paris legal department) and Stéphane Van Gelder (General manager of INDOM, consultant to the City Of Paris

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About dotCities

dotCities is the alliance of city top-level domains and initiatives for city top-level domains. dotCities is currently represented by 5 city top-level domain initiatives and operates as an international forum and platform for exploring issues and concerns common to all city top-level domains.