



20 May 2009

IDN gTLD Constituency Petition and Charter

Please accept the following comments in response to ICANN's publication of the proposed IDN gTLD Constituency Petition and Charter.¹ Go Daddy reserves the right to future comments on this issue and our positions include, but are not necessarily limited to, the text herein.

We acknowledge the dedication and efforts of S. Subbiah's development and submission of this Petition and Charter. However, the petition raises important questions regarding the appropriate Stakeholder Group for this constituency.

The goal of expanded IDN adoption within the GNSO name space is nearly universal among existing stakeholder groups. This breadth of interest in IDN gTLDs is recognized in the proposed petition and charter, which suggest the constituency be organized under the Commercial Stakeholders Group (CSG), and defines membership eligibility to include:

"...for-profit and/or non-profit organizations, government agencies, research and educational institutions and individuals in their personal capacity, etc, that are engaged in or intend to be engaged in at least one of the following activities, namely, those that:

- a) serve IDNgTLD interests;
- b) provide services such as registry, registrar, multilingual web information and other Internet services for IDNgTLDs (i.e. non-LATIN IDN TLDs); ..."²

These broad criteria for membership would appear to be in conflict with the charter of the CSG, which does not extend eligibility to non-commercial entities, or any party under contract with ICANN:

4.2 Membership shall also be open to any additional constituency...[provided that it]... is representative of commercial user interests which for the purposes of definition are distinct from and exclude registry and prospective registry, registrar, re-seller or other domain name supplier interests."³

In fact, the membership eligibility as currently defined in the IDN gTLD petition makes it difficult to identify any specific Stakeholder Group whose charter would

allow it to form.

The Board should carefully evaluate whether the CSG is the most appropriate home for this proposed constituency, given the conflicting charter eligibility requirements for membership. The Board should also consider requesting the petitioner to narrow its membership criteria. As currently defined we believe it will be difficult to identify an appropriate Stakeholder Group.

Sincerely,
GoDaddy.com, Inc.



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1. <http://icann.org/en/announcements/announcement-2-21apr09-en.htm>
2. <http://gns0.icann.org/en/improvements/idngtld-constituency-petition-charter-redacted-18apr09.pdf>
3. <http://gns0.icann.org/en/improvements/commercial-sg-transitional-charter-28feb09.pdf>