



CADNA Comments on ICANN's New gTLD Applicant Support Program: Financial Assistance

The Coalition Against Domain Name Abuse (CADNA) appreciates the opportunity to comment on ICANN's New gTLD Applicant Support Program for Financial Assistance. CADNA recognizes the importance of and values organizations that are devoted to benefiting the public interest. CADNA believes that providing financial assistance to worthy gTLD applicants will make the Program more accessible to a more diverse group of applicants, and applauds ICANN for its commitment to continually improving the New gTLD Program so that it is inclusive of all Internet stakeholders.

CADNA would like to take this opportunity to offer suggestions on the recently released New gTLD Applicant Support Criteria. Currently, the Criteria's eligibility requirements exclude deserving applicants who wish to apply for a trademarked gTLD string. This represents a change from the Joint SO/AC New gTLD Applicant Support Working Group (JAS-WG) Final Report released in September 2011. The Final Report recommended that applicants for gTLD strings that are "intended to reference a specific commercial entity" would not be eligible for support; however, community names subject to legal trademark protections would "not necessarily" be disqualified.

It is CADNA's belief that organizations receiving financial assistance for their gTLD application should be afforded the same opportunities as those applicants who do not need assistance. Like commercial brand owners, many worthy organizations and communities hold trademarked rights to their names and it is often the strength of these names that indicate the trust and capability necessary to carry out their good works. By limiting organizations to non-trademarked gTLD strings, ICANN will take away some organizations' greatest resources. Doing so may deter deserving applicants from applying and ultimately stifle innovation and creativity that could come out of an organization's use of its gTLD string. ICANN should either remove the restriction altogether or offer more details regarding what constitutes a "trademarked brand."

CADNA stands by ICANN in its efforts to make the New gTLD Program globally accessible and looks forward to the innovative and valuable contributions of those organizations that receive financial assistance in order to participate in the New gTLD Program. However, excluding organizations from applying for a trademarked name will limit the scope and impact of the New gTLD Applicant Support Program and detract from its ultimate goal.