

11 May 2011

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Mr. Rod Beckstrom
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Dear Sirs:

Today, the Internet has just over two billion users out of a global population of 6.8 billion people. While in the past most users of the web communicated in English using Latin script, in 2011 27% use English, 23% use Chinese script, and of the top 10 languages found on the Net, fully half – Chinese, Japanese, Arabic, Russian and Korean – use non-ASCII scripts. Hundreds of other languages make up the last 18% of Internet users. IDN usage is clearly on the rise.

However, while the recent *April 15, 2011 Proposed Final Applicant Guidebook* talks at great length about issues of cost and responsibility for new gTLD applicants, there is no mechanism in the Guidebook that will support applicants that wish to offer multiple script versions of their community or product, whether ASCII or IDN, to serve the diverse needs of non-English and non-Latin script users. ICANN, in keeping with its strategic plan, and its international coordination role, needs to do more to open up the Internet to more languages and cultures around the globe.

We therefore urge the Board and staff to revisit this issue and work with the community to provide an approach that enables applicants to offer multiple (“bundled”) applications that include different script versions of the same string at a lower, packaged price.

Two groups would be obvious beneficiaries:

Multi-script communities – like those in North Africa where more than one script is regularly used by community members in their everyday lives; and,

Smaller-script communities – like the speakers of Armenian, Lao or Amharic – whose languages might go extinct on the web if the full \$185,000 cost per application is not adjusted to a considerably lower number.

The key in both instances is to give all applicants the option of ‘add-ons’ to their primary gTLD application that would allow for any transliterations or translations of their chosen string for a packaged price.

Packaged pricing makes sense because it fits ICANN’s stated values by offering the opportunity for more communities and languages to be represented on the Internet and promoting the participation of diverse audiences in the new gTLD process. It will help combat language extinction, provide opportunities for web-enabled development and narrow the digital divide for languages and scripts too small to be viable at the current \$185,000 per application.

This approach also makes budget sense and would stay within ICANN's cost neutrality guidelines, since packaged pricing would not entail any additional cost to ICANN. Where an applicant requests a “packaged” application, ICANN would review the primary application as normal under the AGB review process and then selectively evaluate the parts of each “add-on” application that are distinct – the specific segments that are unique to their string’s second or third IDN or ASCII transliteration/translation. A packaged review of related applications will lower ICANN’s review costs and lower the costs to applicants – leading to more IDNs built out around the world.

For years many members of the ICANN community have called upon the Board to do more in its support for the non-English and non-Latin script Internet communities around the world, starting with a prioritized approach to IDNs. Supporting packaged pricing – from the start, as part of the new gTLD process – will help underserved language and script communities around the world and provide opportunities in a way that is fiscally responsible and keeps to ICANN’s core values.

Sincerely,

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