August 4, 2011
Ref: UISoc-1107-149

To: Dr. Stephen Crocker, Chair
        Mr Rod Beckstrom, President and CEO
        ICANN

PUBLIC COMMENTS
Expanding Developing Economies Participation in the New gTLD Program

Dear Sir,

With reference to the Second Milestone Report of JAS WG, we are thankful to the ICANN's efforts & consideration to expand 'new gTLD Program' for the Participation of Developing Economies. We hope that transparent evaluation process and reassessment exercise through public participation will ensure the enablement of active participation of Developing Economies in the new gTLD program.

As it was approved that the program will be inclusive and Developing Economies will be supported. Fundraising was also started in this regard. However, the provisioning of the supremacy of Richest Economies is still reflecting in this 'the Second Milestone Report'. The grant of the allowance (eligibility) should not be limited to the non-commercial name-scripts applicants. Developing Economies and their applicant's should be granted with the equal opportunities to participate in the new gTLD program as a Commercial Business to form the layers of a common Internet with comprehensive Global Coordination and without domination of a few companies or people. Otherwise, the Internet Business will remain in the hands of Developed Economies monopolies, due to high costs of application and definition of set rules. It is our responsibility to draw your kind attention toward the weaknesses and negative influence of the policies, however, it is your responsibility to ensure the in time modification & implementation.

Please find herewith requested Public Comments, concerning the review of Second Milestone Report of Joint Applicant Support Working Group (JAS WG).

Thanking you and Best Regards

Imran Ahmad Shah

Founder & Executive Member
Urdu Internet Society/ Council
Internet Governance of Pakistan
0092 300 4130617

REVIEW COMMENTS

on

Second Milestone Report of Joint Applicant Support Working Group (JAS WG) On

for

Expanding Developing Economies Participation in the New gTLD Program

Ver: 2

Last Modified Date: 4th August 2011

Submitted to

M/s ICANN

Submission Date: **4 July 2011**

By

Urdu Internet Society/ Council

Internet Governance Forum of Pakistan

Context:

With reference to the ICANN's Board resolution # 20 of Nairobi meeting:

> *"...to develop a sustainable approach to providing support to applicants requiring assistance in applying for and operating new gTLDs."*

Joint Working Group composed of members of ICANN's Supporting Organizations (SOs) and Advisory Committees (ACs) also known as the JAS WG was formed in late April 2010.

JAS WG issued its first **Milestone Report** on 11 Nov 2010; (http://goo.gl/HNdOq) and thereafter public comments consultation process was carried out but after extending comments period for +25 days only two comments were submitted from Africa. http://goo.gl/4DeSU. The main comprehension was quoted by African Community was that:

> *"...all of the most obvious names, including IDNs, will be taken by rich investors, leaving little opportunity to local community institutions and developing country entrepreneurs...".*

Now public comments are requested concerning the **Second Milestone Report (Revised ver. 13 May 2011** http://goo.gl/fKvup**),** which deals with a very important issue:

> *"How can ICANN assist applicants from developing economies increase their participation in the new generic Top-Level Domain (New gTLD) Program?".*

The public comments period was supposed to close on 29th July 2011, first version of my comments were submitted on last date requesting the extension of the closing period. This is the revised version of the previously submitted review comments.

> <previous successful experience about ICANN's Policy Development through different forums including the ICANN's main source to listen "Public Participation through Public Comments">

> "With reference to my past experience with ICANN, I successfully convince M/s ICANN to reduce the cost of the IDN ccTLD to $26,000 and even more the full funding support to developing countries and territories. In order to convince, I had to keep writing to ICANN, submitting the public comments as well as a review of the financial analysis to the relevant department. I insisted on the points that were related to underdeveloped countries, that instead of developing the Operating System, Browser, text writer and Application utilities in the local languages due to constraint of IT budgets and technical support, how they would be able to pay the huge amount as a fee for the namespace that may not be utilized without infrastructure and text editors capabilities. I requested that not only provide them IDN TLD mechanism but also support them with the registry management at the ICANN's end, the L-Root Server. At the end, when the Fast Track round was launched, fortunately and interestingly, along with some other proposals; these were also adopted by offering the applicants from developing countries to request for the 100% waiver of this application fee. Later on UNESCO & ICANN has developed a partnership channel to provide technical support to the countries for establishment of IDN framework and to Promote Linguistic Diversity on Internet. (Imran)"

I would like to disintegrate Developing Economies in to two parts,
   a) Internet user Communities of Developing Economies (ICs of DgEc).and
   b) Business user Constituencies of Developing Economies (BCs of DgEc).
Similarly disintegrate Developed Economies in to two parts:
   a) Internet user Communities of Developed Economies (ICs of DdEc).and
   b) Business user Constituencies of Developed Economies (BCs of DdEc).

Review Comments:

We support JAS WG aim and appreciate the commitment to lowering the barriers of full participation in the gTLD program by the truly global and inclusive community.

Part 3: Who qualifies for support, and how are gTLD applications evaluated against the criteria?
The WG has determined a number of criteria to be used in the determination of a gTLD application eligible **for support** and/or **cost relief** (in this document called the "eligible application"):

JAS WG is requested to please further elaborate the terms of support & cost relief, that who will be and who will be not eligible for support and as well as about cost relief. What are the fundamental basis to segregate applicants?

1. The Application must demonstrate service to the public interest, including one or more of the following characteristics
We believe that there will be zero application which will deny the public interest; however, JAS WG is requested to give any example that same question is included for a standard applicant from (ICs or BCs of DdEc) that is their application service relates to public interest? What kind of public interest is assumed by most of the .brand applications?

• Support by and/or for distinct cultural, linguistic and ethnic communities
Support for the distinct communities is fine. However, the definition of 'the Support by …… communities' is a fragmented criteria. JAS WG is requested to define that what kind of support is justifiable or acceptable for them? e.g. a letter of support from community? or required endorsement of signatures from 100 or 1000 or more members from the related community? or an electronic survey, (whereas that may be manipulated as well).
(Unlike the String Evaluation process of Fast Track IDN ccTLD program, in which practically there was zero consideration toward the community base support survey.)

• Service in an under-served language, the presence of which on the Internet has been limited
We appreciate that the areas of the under-served languages and digitally divided communities are being considered to for local development. However, JAS WG is requested to review that how the ROI or efforts are justifiable (keep in mind the annual fee of US$25K), if the scope of the service deployment consideration is limited to the areas that may not have enough growth and/or development in their languages and at such location where Internet service has been limited? These limitations will not provide them potential to compete the other TLD Business competitors, even to pay their own expenses or the annual fee the gTLD name script (i.e. registry).

To address the needs of these groups, partial (but not consensus) support has been expressed for concept of ⬚"bundling" that is, reducing the price of a TLD string in an ⬚"under-served" language script that accompanies a conventional application for the similar string in a Latin script.
We support and strongly recommend this proposal of •"bundling" variant and translation of same name-script. However, it should be further explained that how to run identical name scripts as parallel registry of complete separate TLDs.

• Operation in an emerging market or nation in a manner that provides genuine local social benefit and
3.1.3 - Operation in an emerging market or nation
The WG achieved full consensus in agreeing that the criteria offered to judge applications give preference to those originating within the world's poorer economies. Rather than having ICANN undertake the distracting task of determining where such economies are located, we would refer instead to the internationally agreed upon UN DESA list:

• Least developed countries: category 199;
• Landlocked Developing Countries: category 432; or
• Small Island Developing States: category 722.
• Indigenous Peoples, as described in Article 1 of Convention No. 169 of the International Labor Organization and the UN Declaration on the Rights of Indigenous Peoples

We highly appreciate the support and consideration of the development of least developed countries. We also agree that operations with in the same geographical area will provide the social and economic benefit to the community as well as the fast technical growth but when you are considering the least developed or under developed economies (123+ countries of G-77), most of the areas needed a huge investment to establish secure and reliable DATACENTER to host the registry services, DNS and DNSSEC implementation as well as the infrastructure to keep the services live and connected to the remaining word for round the clock and 24x7 support. When the current TLDs (ccTLD & gTLDs) are allowed to host their services at any location and clustered services anywhere else, it is requested to allow the ICs/BCs of the DgECs to host their servers for registry and other services anywhere in the region where it is economical for them to obtain quality of services with reliability and security along with the mission statement for high availability.

• Sponsored by non-profit, civil society and non-governmental organizations in a manner consistent with the organizations' social service mission(s)

We agree with these criteria, however, if the sponsored organizations are being assumed to provide financial support of US$45K or US$25K as annual fee, we oppose such criterion. Most of the organizations would not be able to demonstrate the consistent approach of towards their social service mission to facilitate their community with the gTLD services. These are new dimension for the ICs & BCs of the DgECs and even your campaign reaches to them, it is not easy to educate them to prepare for delivering of such kind of services, their benefits and their mechanism. However, JAS WG may recommend interested organizations to include within their charter (onward) about the commitment of delivery of these service(s) for their communities.

• Operated by local entrepreneur, providing demonstrable social benefit in those geographic areas where market constraints make normal business operations more difficult

We appreciate JAS WG to promote and motivate the local entrepreneur but such kind of obstacles will become over burdens & hindrances for the prospective / potential applicants (ICs & BCs) of the DgECs to evaluate their proposed name-script first on the basis of Social Benefits and in their Geographical Areas. There is no such compulsion (heard till today) for those competitors who can put huge money to this business. Instead of creating new obstacles, JAS WG was given mandate to reduce the barriers to ensure the full participation.

2. The Applicant must demonstrate financial capabilities and need
Notes: 3.2
Applicants must be capable of contributing $45,000 towards ICANN's application fee, unless ICANN waives, or lowers application fees.

"Financial Capabilities…..Contributing $45,000":   Is it any estimation of by JSA WG that a standard organization from Developing Economies will have some surplus budget to invest for the Internet Community welfare scheme like participation for TLDs' Business? In my own region, I do not see any organization which has surplus reserve funds. Even, most of the NGOs obtain local or foreign grants from the ICT Funds, Local or Central Government, UN or World Bank, US-AID or International donors for their significant project deployment and to be completed within a limited period. There may be 4-5 organizations that have huge funds available with them as reserve funds, obtained from donation, but it seems that JAS WG only focusing these institutions to represent the ICs & BCs of DgECs? I do not think so, because JAS WG reports used the other terms like "distinct cultural, linguistic and ethnic communities, under-served language, non-profit, civil society and non-governmental organizations".

According to the definition of "Expanding …..", it seems that the program was initially developed for the ICs/BCs of DdECs, but now it is being extended to the DgECs. Once ICANN has decided to extend the gTLD Business toward the Developed Economies with granting sustainable approach to providing support, it should be clear identification that how much cost reduction is fixed from ICANN?

The initiation of new gTLD Program deployment should be focused for the global users, instead of saying that expanding the participation of the developing economies. If ICANN considered global users participation as its primary objective, the basic fee structure (+onetime cost) should have been minimum.

It is proposed that the ICANN's fee for DgECs should be nominal; a few hundred dollars are enough.

"Financial Needs":   Agreed, that the applicant should demonstrate that they are in need of financial support to become capable to participate in the new gTLD Program.

> Where applicants anticipate scheduled fees, such as for extended evaluation, the applicant must be capable of contributing a quarter of the scheduled fees.

Please elaborate the Scheduled Fee, and be noted that if the applicant is unable to bear the primary cost, how they would be able to demonstrate the costs of the extended evaluation etc. Once the name-script/string is approved, he should be compensated in all the costs, without asking him that we have paid the costs of this stage but you have to bear the cost or its portion in next stage.

> If the applicant proposes to share registry continuity operational costs with other qualified applicants, the applicant must be capable of contributing the pro-rated proportional share of this cost.

JAS WG is requested to further explain the "share registry continuity operational costs with other qualified applicants". Is it allowed to be shared among DgECs & DdECs or limited among DgECs. It is also necessary to elaborate that are the applicants going to be allowed to apply for same name-script mentioning that if the other applicants also apply for the same, we will be sharing registry with them? Or they have to apply for a shared registry from pre-defining the stakeholder of the shared registry?

> Applicants should provide background on economic, technical, administrative, legal, and/or socio-cultural factors within their environment which are causing these constraints.

We agree that the applicant should provide background of the economic conditions that are causing constraints, but such list of weaknesses should be considered to support and help strengthen enough to cope with them, instead of highlighting their weaknesses negatively and using there statement of declaration as a tool for the easy rejection mechanism of the application.

> 3. The Application must NOT have any of the following characteristics:
> • From a governmental or para-statal applicant (subject to review, see below)

There are many least-developed countries that may not have sufficient resources, knowledge and infrastructure to participate in this program. In such countries or territories, only Government would hardly be able to provide or to run the community welfare projects, development project for under-served languages and social services. So, it is requested to remove allow the Government or its subsidiaries of countries who are near the bottom lines in the list of G77. According to my knowledge, these are at least 50 countries.

> "By consensus of the WG, purely Governmental or para-statal applicants have been listed as not entitled to receive support. However, at the ICANN San Francisco meeting the WG received a request from the GAC to consider including Government applications from Developing Countries for support. The WG will work to obtain a mutually acceptable definition and criteria to fit Government applications with the GAC WG, but recognizes the difficulty in measuring a government's "need" and concern of the appropriateness of offering support for one government over another if resources are limited. The GAC WG has offered to review the JAS

We appreciate and support GAC request to consider the Government Applicants for DgECs. We strongly recommend this proposal and agreed that GAC WG may please be review the needs or criteria but I believe that most of the least developed countries do not have enough representation in GAC WG. So, if the criteria or policies are being reviewed through the GAC Members of the DdECs the outcomes would not have true representation of the Government representation of DgECs.

- A TLD string explicitly based, and related to, a trademark (ie. a "dot brand" TLD)
- A string that is, or is based on, a geographic name

The provisioning of the supremacy of Richest Economies being reflected in these ineligibility clauses. In this proposal the support is being restricted only for non-commercial name-scripts applicants. The applicant of developing or least developed countries are not allowed for financial support if they select a TLD String which is related to trademark, .brand or geographic name. Developing Economies and their applicant's should be also granted with the equal opportunities to participate in the new gTLD program as a Commercial Business to form the layers of a common Internet with comprehensive Global Coordination and without domination of just a few companies or people. Otherwise, the Internet Business will remain in the hands of Developed Economies monopolies, due to high costs of application and definition of set rules.

We are not able to understand that why trademark holders of the Developing Economies are being excluded to grant compensation in the fee and other relaxation. Most of the brand holders are not making enough commercial earning comparing to the International brands/trademark holders of the Developed Economies. But they might have a good name script suitable for .brand TLD, but their current brand registration is just the protection of copyrights among the competitors of their own local region. Similarly, it is also proposed by JAS WG that applicants from the Developing Economies (and prospective beneficiaries of the compensation) may not able to choose the geographic name. JAS WG is requested to elaborate the purpose of this suggestion? Is there any intention to keep reserve the geographic name strings for the richest economies or diverting the business of geographic name TLDs to those applicants who are able to pay full (huge) costs? Rich organizations will become richer or richest.

At the other side JAS WG quoted the support for under-served language and digitally divided corners of the globe. But due to these ineligibility clauses, they would not be able to get benefit from the actual theme, the basic concept of the equal opportunities for everyone.

4.1.1 - Cost Reductions
The WG recommends the following fee reductions to be made available to all applicants who are determined as meeting the criteria established for support:
- Waive (consensus for this in the Milestone report) the Program Development Costs (US$26,000)
- Lower risk/contingency cost (US$60,000)
- Review Base cost (US$100,000) to see if reduction can be made

We believe that program is already developed and is matured enough. Every additional applicant from DgECs will cost just few hundred dollars to ICANN. So, why the US$26,000 are being charged from DgECs in term of program development charges? JAS WG is requested to further elaborate the cost and reasons to charge in term of the lowering risk and contingency. It should be responsibility of the registry to ensure the maximum uptime of its services and they have to be supported financially and/or technically to ensure high availability or risk management alternate solutions. So, we do not agree with this cost to be transferred to the any applicant from DgECs. Review base costs of about US$100,000 should be waived off 100%, because the application review that we propose should be made through the resources of the same Developing Economies and it is approved, the cost of the resources will be very much lower than current assumptions. (ten times lower)

• Cost reductions to encourage the build out of IDNs in small or under-served languages.

JAS WG is requested to elaborate that how much cost reduction is going to be recommended to encourage IDNs name spaces? Granting support for the applicants who select alternate as translated name-script into IDNs, would not serve the purpose. The applicants from under-served language areas should also be grated the financial and technical support to develop the IDN-Conversion tools, Plugins, IDN-Web-Components, Browsers-IDN-Tool-Bars and Resellers-APIs. We appreciate the GOOGLE on development its tools, which are being used for bridging between digital gaps among the non-English communities to survive. However, there is still a huge gap exists to be filled up with immediate action.

• Lower registry Fixed Fees

JAS WG is requested to elaborate that what is the actual costs involved and how much cost reduction is going to be recommended.

• Exemption or deferment of IPv6 implementation requirements as possible

We believe that ICANN is one of the stakeholder resource to help in the migration to IPv6, so, the IPv6 implementation should not be compulsory for DgECs but ICANN is supposed to guide them, help them, and/ or coordinate with them that how and when they would be easily migrate from IPv4 to IPv6. This allowance is being accepted, keeping in mind the limitations of the global dependencies and limitation of the DgECs (Developing Economies) in providing the IPv6 ready Communication Infrastructure.

Further reductions recommended
• Reduction of the Financial Continued Operation Instrument Obligation to 6-12 months

It is suggested that the reduction of the financial obligations should be 24-36 months instead of just for 6-12 months, because the developing economies would not be able to spend huge funds on the advertisement and publicity, arranging to signing the contract with maximum numbers of registrars and appointing the resellers for their services. (in order to cover the worldwide/global market, as comparing to the other competitors). And if they are not able to bear the obligatory financial burden, those applicants should be supported financially to keep their services live.

4.1.2 - Staggered Fees
Instead of paying the entire fee upon acceptance of the applications, applicants meeting the criteria established for support could pay the fees incrementally. Staggered fees payment enables an applicant to compete for strings that might otherwise have gone to the first and/or only group with enough money to apply.

We appreciate JAS WG to support the applicants of DgECs with the staggered fee, but keeping in mind that if they have started the registration domains and earning the money. Otherwise, how they would be able to pay back?

We could not understand the rezoning explained in the second part of this paragraph. "that might otherwise have gone to the first and/or only group with enough money to apply.". What does it mean, if the applicant of grant support (from the DgECs), is unable to pay back the fee, there is threatening that this registry may be given to other group who may have enough money? We oppose this option. Once an applicant is granted with the financial & technical support on the approval of his proposed name script, he should not be threaten that any other can snatch the registry with using the power of wealth.

4.1.3 - Partial refund from any Auction proceeds
Qualified applicants receive a partial refund from any auction proceeds - for which they can repay any loans or invest into their registry. It could be used to refill the disadvantaged applicant's foundation fund for subsequent rounds.
Note: Ongoing support will be limited to five years

We do not agree with this kind of solution of the auction or bidding to resolve the conflicts, so, we have no comments on this.

Part 4: What benefits do qualified applicants receive?
4.2 Non-financial support/relief from ICANN
• Logistical assistance
• Technical help
• Legal and filing support
• Awareness/outreach efforts including efforts to ensure more people in under-served markets are aware of the new gTLD program and what they can do to participate in it
• Deferred requirement of DNSSEC
• Relaxed vertical integration regulations

Financial support reserved for Awareness Campaign $750,000
The reserved amount is very much short to run the proper outreach awareness campaign in 5 regions. For example Asia Pacific program will have 1/5th = $150,000, how many countries are in AP region? + Middle East? In my country (Pakistan), a single TV Advertisement of 2 min cost about 5K-10K and TV Channel timing cost is about $1000 with one time playback in single day. Outreach program should include the experts and business analysts' debates on local TV Channels, in their languages. Newspaper Articles and Technical Capacity Building will also have some costs involved. So, the reserved amount should be increased to 200-300% to cover the mentoring and support for learning curve.

https://community.icann.org/display/newgtladvertising/Home

Q: With respect to the target regions "Geography", ICANN is casting a wide net (basically the entire world). In order to maximize the budget, is ICANN in a position to prioritize the geographic regions including identifying key markets in each area (e.g. specific cities such as New York, Los Angeles, London, Tokyo, etc.)?

A: Countries were listed above. Possible cities include: **London, Berlin, Munich, Prague, Moscow, Paris, Barcelona, Dakar, Nairobi, Johannesburg, Abu Dhabi, Beijing, Hong Kong, Mumbai, Seoul, Sao Paulo, Buenos Aires, Mexico City, Toronto, Vancouver, NY, Washington, LA, San Jose, Chicago.**

I would also refer the above to the above focused cities of the world, but if we speak a global participation, or global campaign, we should replicate the same advertisement in each country translated into their native languages+ English as a common language.

It is also suggested to ensure the maximum participation in ICANN Summit on Developing Countries (ISDC) is being planned to be held during the Oct. 2011 ICANN 42 meeting in Dakar. ICANN and funds supporting organizations should formulate the grant of the extended fellowship for the ICs/BCs from DgECs in addition to current fellowship program which has been closed.

4.3 Support from third parties facilitated by ICANN
4.3.1 - Pool of collected resources and assistance
• Translation support
• Logistical help
• Technical support
• Awareness and outreach
• Infrastructure for providing IPv6 compatibility
• DNSSEC consulting
• IDN implementation support
• Possible technical setups

We appreciate JAS WG to support the applicants of DgECs by providing above third party facilities by ICANN and preparation of pools of the expert resources for assistance of the applicants, however, this support should not be exclusive for only approved applicants but also for the prospective applicants who are planning to participate.

> 4.3.2 - Directory and referral service only for eligible applicants
> - Facilitating contacts with granting agencies and foundations
> - ICANN would facilitate but cannot commit to providing

In our opinion, ICANN should have to express the full commitment to provide all the applicants with the same level of facilitates and equal opportunities.

> 4.3.3 •- IPv6 Support
> For registries located in areas where IPv6 connectivity is limited or unavailable, ICANN will facilitate support from IPv6 providers to provide IPv6 gateways into the registry IPv4 services.

We believe that ICANN is one of the stakeholder resource to help in the migration to IPv6, so, the IPv6 implementation should not be compulsory for DgECs but ICANN is supposed to guide them, help them, and/ or coordinate with them that how and when they would be easily migrate from IPv4 to IPv6.

Some more recommendations are being enclosed hereunder with the same context:

Application Period:
As the JAS WG report repeatedly mentioning that the date of further subsequent round is not confirmed, it is suggested that the application period for the Developing Economies should be expanded to at least 9 – to 12 months instead of just 3 months. This proposal is based on the facts and experience of learning curve and progress ratio of the Developing Economies and as well as the least developed countries. The ratio of the technology awareness and its penetration in public is very slow, that is why the most prospective clients will be making their mind to enter in this new gTLD business in first or second quarter but as the learning curve is slow; they would not become confident enough to overcome on the weakness, unless they are educated well. It is also observed that the awareness campaign is supposed to be launched primarily in the key market areas / cities.

Overall Application Fee Structure:
I would insist to reconsider the following proposal of Application Fee Structure on the basis of the selection of shorter Name Script.

> http://www.icann.org/en/topics/new-gtlds/summary-analysis-eoi-04jan10-en.pdf
> QUOTE
> IDN gTLDs and ccTLDs. To promote the selection of fewer characters for IDN gTLDs (and ccTLDs), thereby reducing time and resource costs for Internet users, the first round application fee should be charged according to the number of characters (i.e., a basic fee for two letters; 50% additional for 3 letters; 100% additional for 4 letters; 150% for five letters; and 100% for every extra letter for longer scripts). I.A. Shah (9 Dec. 2009).
> UNQUOTE

Similar option may please be considered for Commercial & Non-Commercial name script, for both Developing and Developed Economies.

Support the Ideas from Developing Economies (related to Social Welfare name script)
Again I would insist to reconsider the support of the Idea Generator, that if the name script is satisfy the means for social & public welfare, and in any case the originator (applicant) may not be able to proceed the TLD Registry application, the name script should be adopted by the ICANN or its subsidiary/ working group and the idea generator should be compensated with a royalty scheme.   he could not continue to

http://www.icann.org/en/topics/new-gtlds/summary-analysis-eoi-04jan10-en.pdf
QUOTE
……. If the noncommercial name's usefulness is ensured by the public comment/survey process, the proposed name script TLD should become live, even if the applicant (aka the idea generator) is not going to host or manage the registry for it, in which case it can be offered to other registry operators, an ICANN subsidiary or operated through the ICANN L-root server. ICANN could allocate a minimum amount of the registration fee to be paid to the idea generator.
UNQUOTE

Financial Support ……
If the ICANN allow to 100% waiver of the fee and other costs for the applicants of the Developing Economies, there will not be a huge burden on the shoulders of the funding support organization and that will also encourage more applicants, name scripts' applications from Developing Economies. Ultimately, the Developing Economies would be strengthening through a little support.

JAS WG is requested to arrange to remove the comprehensions about the new gTLD Program and negative influence/ impact by ICs/BCs of the DdEc/ Richest Economies.