

Name.com's take on the "Strawman Proposal"

Name.com appreciates many of the actions ICANN has recently taken to ensure that the new gTLD launch occurs in a timely and well thought out manner. Many recent developments and initiatives by ICANN represent a new level of engagement, ownership, and management of a project that is multi-faceted and in many ways unprecedented.

In the spirit of active community engagement, Name.com recognizes that ICANN strives to address desires and objectives of all ICANN participants. However, we call on ICANN to recognize the need for predictability and equity when addressing the desires of a minority of ICANN participants. If ICANN moved forward with the proposals at hand, ICANN would be addressing the desires of a small constituency at the cost of removing the predictability and equity of a majority of ICANN participants. This decision stands in stark contrast to the trust and processes that ICANN has developed in the bottom up consensus model.

Others have done an excellent job pointing out the costs, problems, and potential questions left unanswered by the specific proposals at hand. These aspects are addressed in depth by many different parties' responses including but not limited to the Registrar Stakeholder Group comment. Instead of re-hashing these detailed arguments, we believe it would be more useful to address what is at stake at a higher level. ICANN's departure from a predictable, equitable and established bottom up consensus model (on this issue or any other) has far reaching consequences that cannot be underestimated by ICANN.

Removing the predictable and equitable nature of decision-making the ICANN community has relied on for years has far broader effects than the serious cost and implementation concerns for those directly affected – in this case registrars and applicants directly. This departure also has substantial effects on ICANN's role in the community. We would encourage ICANN to reflect on how they can claim to be proponents of an open and free Internet, while at the same time catering to the interests of a minority outside of the established consensus model. We would also ask ICANN to recognize that it is tasked with facilitating hard decisions after receiving extensive community input. To then re-open these discussions at the behest of a narrow interest group after a decision has been made and acted upon, seriously calls in to question the strength of ICANN's own process and decision-making capability.

As an active participant in ICANN, Name.com has confidence in the principles and processes that have and continue to guide ICANN. We hope that ICANN can regain confidence its own principles and processes while recognizing the need for predictability and equity intrinsic to the bottom-up consensus model. Name.com strongly supports the comment submitted by the Registrar Stakeholder Group and looks forward to continuing to actively participate in ICANN's bottom-up consensus model moving forward.