

ECLID network includes projects of european cultural and linguistic internet domains (.bzh, .cym, .eus, .gal, .scot). The aim of such TLDs is to make the name space of Internet more accessible to our communities and promote the diversity of contents. The example of .cat shows that such registry would operate a modest number of domain names (41,000) compared to commercial gTLDs or even well developed ccTLDs. Nonetheless, the .cat has demonstrated its economical viability and added value to the name space, given the high percentage of use per domain.

Considering the community-based TLDs (or also .brand « single-registrant, single user » TLDs) market which could be unsignificant for existing registrars, we believe that limited exceptions to vertical separation should be authorized.

Indeed, registrars may have weak incentives to devote resources to new gTLDs targeting a narrow registrant base, leaving these TLDs with limited access to the retail channel. To motivate the cost of servicing an additional top level domain, registrars typically require a "threshold" volume of potential registrants, and if they believe that registration volume will be limited, they may opt not to operate in the TLD, forgetting community end users.

We believe that the cITLDs capacity to run an ICANN accredited registrar, with the appropriate thresholds and check and balance systems, would create the development of a more competitive market, respond to our communities expectations and permit the diversity in the Internet.

Thanks for your attention