



**WORLD HEALTH ORGANIZATION
COMMENTS ON THE DRAFT CRITERIA
FOR THE SELECTION OF NEW SPONSORED TLDs**

16 MAY 2003

The World Health Organization (WHO) is pleased to submit these comments and show its support for the consultation document entitled “Criteria to Be Used in the Selection of New Sponsored TLDs (sTLD)”. WHO remains committed to implementing the new sTLD, *.health*, which will address the needs and interests of the global health community.

Referring to the posted consultation document, we offer the following general comments:

1. The proposed new criteria are clear, comprehensive and reflect ICANN's experience with implementation of the new sTLDs. WHO generally supports the approach and criteria as stated in the document, and shares ICANN's concerns for the continuing stability of the domain name system (DNS). It appears that there will be less of a burden on the applicants than in the previous round, while the criteria proposed actually sharpen the focus on the important dimensions for the evaluation of proposed sTLDs. The clarity of the criteria should also make the evaluation process more straightforward.
2. The previous request for proposals emphasized the element of “competition” and encouraging new businesses into the DNS. We appreciate that times have changed and that a longer term view is an important aspect for evaluating new sTLD proposals. We also believe that any new sTLD should contribute to the differentiation of the DNS in a useful way.
3. WHO fully supports the view that new TLDs should comply with the WHOIS and universal dispute resolution policy (UDRP) requirements and other policies which may relate specifically to the particular sponsored TLD.
4. Several of the criteria may raise specialized issues in the evaluation process that could require expert input. For example, the “appropriateness of the sponsor and policy-formulation environment” (point 2(b)) is an important element for determining the responsiveness of a proposed sTLD to the community it intends to serve. However, under this item, criterion 2(b)(iv) in particular will require an evaluation of the “extent to which delegated policy development/approval mechanisms are well-designed to meet the needs of the defined community and

the sTLD”. Evaluating this element could be difficult for teams which are not familiar with the particular user community. It has been proposed that independent external evaluation teams will be supported by cross-constituency experts, but ICANN may also wish to consider consultation with an appropriate expert relevant to the proposed sTLD field.

5. WHO is aware of the comment submitted by the United States Council for International Business (USCIB), which refers to WHO and its plans to resubmit a new *.health* application and highlights this application as a “case study on the need to consult and obtain the broad support of the community affected by a new sTLD.” Following meetings of the World Health Assembly and the WHO Executive Board later this month, WHO will issue more details about *.health* and its plans for consultations on this proposal. In the meantime, some preliminary comments are presented here to address any concerns which the USCIB might have.

Background

Use of the Internet for health purposes is rising. Estimates of the number of health-related websites are in the hundreds of thousands and a search for “health” today on a common search engine yields over 100 million pages. Tens of millions of individuals around the world rely on the Internet to obtain information that enables them to make critical health decisions. However, the rapid proliferation of information and the nature of the Internet make it particularly difficult for users to judge the quality of information and services they find.

In response to this situation, many groups are involved in developing and promoting quality criteria, guidelines and standards for health information on the Internet. Prominent among them are governments, industry groups, and consumer and professional associations.

WHO has been consulted on these various standards. As an internationally-recognized, neutral and authoritative agency, WHO is widely viewed as the natural entity to provide guidance for reliable health information, as the recent SARS epidemic illustrates.

A key mandate of the World Health Organization is to assure that relevant, high-quality health information is widely available and effectively used on an international basis. WHO's constitutional functions include providing health information and assisting in developing an informed public opinion on matters of health. In 1998 WHO's World Health Assembly urged Member States to promote use of the Internet to obtain scientific information about medical products, validated by competent health authorities to ensure the quality of information.

Introduction to *.health*

One purpose for introducing new top level domains is to make information more easily identifiable and accessible to users. WHO recognized the expansion of the DNS as an opportunity to identify reliable health-related information and has proposed the

establishment of *.health* as a new top-level domain. The aim of *.health* is to establish an easily-recognized label for trustworthy health information, where users can find information and services that meet certain minimum standards for quality, reliability and ethics.

The *.health* management process would involve the establishment of a policy advisory board, drawn from Member States and stakeholders such as professional associations, health industry related groups, consumer associations, educational institutions, health foundations and Internet professionals. It would also involve contracting with an entity (the registry) to manage the domain, to be approved by ICANN.

The *.health* sTLD would operate in a manner similar to that of other sponsored TLDs. For example:

- Registration in *.health* would be voluntary. Health sites could apply to be listed in *.health* or use another domain name, or both.
- The introduction of the new domain name would not restrict entities from using the Internet generally or otherwise censure the type of content that can be made available through the Internet.
- The fees to register in *.health* are not intended to present a significant financial burden. Further, WHO plans to encourage a pricing structure that would make registration affordable to registrants in developing countries.
- *.health* will require clear and accurate registrant identification details, which can also be used as the basis for the WHOIS service and enable a better judgement as to the credibility of the information source.

Adherence to *.health* policies would benefit legitimate businesses, which could thereby assert that their websites meet minimum quality standards and comply with laws in their country of origin.

WHO will seek to promote the importance of quality standards in Internet health information and will provide support to organizations and governments aiming to formulate or adopt quality standards. However, it is important to emphasize that WHO will not seek through implementation of *.health* to “regulate the flow of information” on the Internet or advance its own views on health-related content, concerns raised by the US Council on International Business. It is not WHO's intention to “patrol” the Internet or to seek to remove particular content, even if such an objective were realistic. WHO's purpose simply is to provide a means whereby reliable health information can readily be found.

The current SARS epidemic illustrates how *.health* could play an important role in the health of the public. WHO declared a global public health alert following the emergence and rapid spread of SARS in March 2003. While this alert was vital, an unfortunate consequence was that very quickly many thousands of SARS-related websites appeared which offer products claiming to cure or protect against the disease. The goal of *.health* would be to minimize exposure to misleading claims, by putting in place a structure within the TLD that would promote high-quality and reliable information.

Three ways in which *.health* would seek to improve quality

The sTLD *.health* would seek to advance quality standards for health on the Internet through:

- Enhanced data on domain name registrants, to improve transparency to the public and accountability of information providers.
- Policies to limit registration by sub-domain to eligible individuals and entities. Here, several elements, which may differ by sub-domain, could be considered: who is eligible, the standards to be applied (e.g., determined in consultation with the relevant stakeholders), and the level of certification and follow-up required.
- Dispute resolution policies (i.e., UDRP) to enable a fair challenge post registration. Additional dispute policies could be adopted to address issues beyond intellectual property, for example, eligibility-specific complaint policies and procedures for certain sub-domains.

Consultation

There are a number of ways in which WHO continues to consult with relevant stakeholder groups on quality standards. WHO is an intergovernmental organization representing 192 countries. Over fifty years as the leading international health agency has produced well-established processes enabling Member States and many other interested parties to help shape the initiatives and policies of the Organization. Arguably, this combination of experience and global reach makes WHO a more broadly representative organization than any other TLD sponsor.

To date WHO has taken part in discussions on health Internet quality standards with various groups at numerous meetings and fora. This participation will continue, in accordance with WHO's mandate.

As noted above, WHO plans to issue a general proposal for discussion concerning *.health* and to engage in a broad Internet consultation, in which all parties would be invited to send their comments to WHO. WHO will inform ICANN when this consultation commences.

Conclusion

With a long-term perspective and based on the lessons learned from the introduction of the other 7 new TLDs, WHO would plan a considered and careful rollout of *.health* to manage properly the introduction and implementation of the domain.

We thank you for this opportunity to participate.

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