# Comments to the 3rd Draft Applicant Guidebook

With our .berlin TLD project we participated in and contributed to the new gTLD process from the very beginning in 2005. With our partners and community, we represent thousands of Berlin based SMEs, organizations that are owned or shared by the City of Berlin, hotels, Internet businesses, registrars and individuals. For the 3rd Draft Applicant Guidebook we have comments and change requests by which we are aiming to get a fair and timely treatment on our way to acquire our own identity on the Internet:

## Capital Names need to be protected

Capital Names like BERLIN or PARIS have been noted as separate sub-category of Geographic Names in DAG3; this is a step forward to their protection. As we and others understand DAG3 it is still possible to file an application for .berlin if the applicant is the Town of Berlin (Vermont) with a support letter of the US Government. This is not acceptable for Capital Cities.

## Creating Competition do not mean Lower Prices for Domains

 Price competition is not necessarily associated with lower domain prices; it is also a question of the added value a new domain name offers. If a Berlin based sunflower shop can reach a better search engine position with a US$ 50.00 www.sunflower.berlin than with a US$ 20.00 www.sunflower-online.net then the initially more expensive .berlin domain name offers huge cost saving at the end of the day.

## There is a clear Demand for GeoTLDs

City and Geo TLDs are always mixed up with other new gTLDs in the discussion on economic parameters. First of all the studies the German Internet Association eco and separately we as dotBERLIN have conducted show that e.g. 80% of businesses would be interested to register a .berlin domain name and 43% of individuals prefer www.mayor.berlin as their preferred domain name to find the Berlin mayor. Secondly we do not see any economic consultant or ICANN in the position to decide if a city or geographic region has a demand for its own identity. It should just simply be mentioned in the upcoming economic studies that there is a significant demand of cities, cultural, linguistic and geographic regions for their own TLD.

## New gTLD Applicants need a Timeline!

We urge ICANN to proceed with the introduction of new gTLDs. Arguments on this topic have been articulated on plenty occasions by new gTLD prospects and other members of the ICANN community, we do not want to repeat them here.

Author is Dirk Krischenowski, Founder and CEO of the .berlin top-level domain initiative, Berlin, November 14, 2009