

Peter, Rod, Kurt,
and all ICANN staff.

Thank you very much for all your hard work on the introduction of new gTLDs. We see this DAG v4 as a more mature document where we see much of the stakeholders' and community concerns addressed and resolved. Nevertheless we still have some concerns in the following topics:

1. Timelines

We urge ICANN to provide a clear timeline to give certainty to all initiatives, investors and all interested parties. Please put some date labels on the nice icon markers.

2. Vertical Integration.

We think that some form of vertical integration could be beneficial or even necessary for some of the new gTLD initiatives.

We've been in a lot of discussions on how the big Registrars which detent market power and are owners of the shelf space could be a big bump for small, emerging, new gTLDs.

It is of strategic relevance for new gTLD initiatives to be sure that they will be able to offer the domain names to their target audience to accomplish their objectives while gaining stability and sustainability.

Version 2 of the DAG had some of what was needed, or at least had the means for some of the initiatives to make it work.

Giving new Registry Operators the opportunity to run an affiliated ICANN accredited registrar, even if restricted to manage no more than 100,000 names under the TLD, would greatly help them to have exposure to their target audience, and have the means to guide their outreach efforts more effectively. But that is not enough; it is even more relevant strategically to provide non-discriminatory access to registry services to all ICANN accredited registrars because they are the key to a successful TLD. We think that with this opportunity, the Registry Operator can design a business model that can help all registrars to be successful, while achieving sustainability and economic stability for the TLD.

Registry Operator would use a uniform agreement with all registrars authorized to register names in the TLD, to give them equal opportunities to benefit from outreach, marketing and community engagement campaigns run by Registry Operator.

We think this could be an initial approach, we would like to see the Registry Operator being evaluated in 1 or 2 years to assess its performance in terms of providing equal and non-discriminatory access to all ICANN accredited registrars so the limits on the number of allowed domains names could be increased or completely removed.

3. Financial instrument to fund registry operations.

Although we agree with ICANN's concern on registrant protection, we consider that the requirement of the financial instrument to fund TLD critical services operations for three years could be a very high obstacle for many of the initiatives.

The registrant protection can be achieved by different kinds of arrangements that still can guarantee the availability of critical services for as long as necessary. This arrangements can take the form of signed agreements with other entities like registry service providers or other registry operators who will commit to maintain the operation of essential registry services for as long as the transition process is completed, rendering any other financial instrument unnecessary.

4. Trademark Front-Running

We support the issue raised by Antony Van Couvering that no special consideration should be given to an applicant that holds a "dot TLD" trademark.

Best Regards

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NIC Mexico
.LAT initiative