

CNNIC thanks ICANN for given the chance to comment on DAG 4. CNNIC welcome the notion of setting up new gTLDs to cater to the need of global Internet users. However, CNNIC would like to point out two of our concerns on DAG 4.

First point is the fair treatment of variants. As is known to all, there are variant issues for some language scripts. According to current policy, variants will have to be blocked or reserved till a proper solution for variants comes up. This policy may pose intentional advantage of some variant over the others, and may cause user confusions.

In the case of Chinese script, strings of simplified form and traditional form shares the same meaning and hence are used equally among Chinese Internet users. Block or reservation of either form will deprive certain group of Chinese users of the right to access the Internet in Chinese scripts.

In order to grant Chinese Internet users the equal right to access the Internet, CNNIC appeals ICANN to consider a proper solution to Chinese characters before launching new gTLDs. It may applicable that should the applicants abide by the similar requirements on “.China”, ICANN will approve the applications of the two string requests in a bundle.

The second point is concerning the cost. According to the DAG, any potential applicant will have to pay \$185,000 upfront application fee, plus variable fees allocated for objection, auction, and so on. Totally, an estimate of \$400,000 will be needed just for the application, not to mention money for daily operation, system upgrade and funds allocated for financial sustainability of 5 years.

In view of the huge cost, it is advised that ICANN consider setting up different fee models for different type of TLD applications to alleviate the cost on applicants. A sensible a fee model will greatly enhance the chance of success for new gTLD process.