

The At-Large Advisory Committee ("ALAC") wishes to add an additional comment on the Proposed Final Applicant Guidebook ("PAG"), to supplement comments already endorsed and submitted as public comment. The original comment can be found at <http://forum.icann.org/lists/5gtld-guide/msg00039.html>.

Specifically, we wish to formally support both aspects of the comment made by Alan Greenberg regarding the reduction of the URS response time noted in the Universal Rapid Suspension ("URS") document, listed as an unnumbered addendum to Module 5 (<http://www.icann.org/en/topics/new-gtlds/draft-urs-clean-12nov10-en.pdf>).

Mr. Greenberg's comment can be found at <http://forum.icann.org/lists/5gtld-base/msg00005.html>.

As indicated in our previous statement, we have serious concerns regarding what we consider to be backwards steps from areas of community consensus. As one particularly serious example, we wish to draw attention to proposed URS rules which appear to regress from the position taken by the cross-community Special Trademark Issues ("STI") group and from the Draft Applicant Guidebook version 4.

Although 14 days may be sufficient for large corporate entities, it is not sufficient for registrants who are individuals, small businesses or non-profit organizations -- particularly those located where mail delivery is not as effective as in the US or Western Europe. Given that the overall URS process time had been reduced moving from the IRT and staff proposals to that of the STI, there is no call for reverting to the 14 days. When public comments to earlier rules were reviewed, the ICANN staff decision was to not adjust the time period. This decision was presumably based on a few complaints about it being too long, and a larger number about it being too short.

As the STI process was one of ICANN's more successful efforts to bring compromise to what were initially VERY opposing positions, it is disturbing to have the Board micro-manage the issue at this level and late date.