



United TLD Comment on the gTLD Marketplace Health Index (Beta)

United TLD Holdco Ltd., trading as Rightside Registry ("Rightside"), a registry operator for forty new generic top level domain names wishes to thank ICANN for the opportunity to provide comments and suggestions for improvement of the gTLD Marketplace Health Index. (MHI).

Rightside believes that usage of a TLD is an important data point to monitor and study and this key element does not seem to be included currently as part of the MHI. We believe that domain name usage is a better indicator of long-term viability of a TLD than renewal rates. Rightside defines "usage" as any domain name registered in a TLD, excluding domains that do not resolve or are "parked" for monetization of traffic using advertising.

In addition to the above, Rightside also believes other metrics have bearing on marketplace health and should be included in any TLD study including:

- 1) Concentration of registrants per TLD (i.e. how many domains per registrant are registered in the TLD, or registry level); and
- 2) Average number of years of registration length per TLD.

We hope that ICANN finds these suggestions useful and will include them in the final MHI report.

Sincerely,

A. Statton Hammock, Jr.

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Vice-President, Business & Legal Affairs

Rightside Group Ltd.

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