



August 17, 2013

The Board of Directors  
New gTLD Program Committee  
ICANN  
12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536

**RE: New gTLDs for Internet Users worldwide - 20% are delayed...that's 20% too many!**

Dear ICANN and New gTLD Program Committee (NGPC),

I respectfully wish to offer comments on this issue because the multi-stakeholder model is proven to be valued and adhered to. I am the CEO of DotGreen Community, Inc., submitter of a single application in string contention and an ICANN community member and contributor to the multi-stakeholder process of the new gTLD program since 2007.

The .GREEN TLD is listed in the Names Collision Report as part of the 20% of new gTLDs that are recommended for 3-6 additional months of additional study based on an alleged and uncalculated risk to the DNS. The DotGreen Community, Inc., like many other new gTLD applicants, exists to bring public benefit, innovation and consumer trust to both the Internet user and the Internet naming space. When delegated, .GREEN and others may also bring the benefits of competition to the name space. Earlier this year, DotGreen Community, Inc.'s application for .GREEN passed ICANN's stringent Initial Evaluation, IE for technical capabilities and qualifications.

DotGreen Community, Inc., and the .GREEN TLD initiative has been present in a progressive and prominent open and transparent way for six years. We have been attending ICANN meetings for years, amongst some of the most highly technical colleagues and professionals in the industry. No one has ever addressed that the .GREEN TLD would pose a technical risk to the DNS. Instead, regular feedback from the Internet Industry and GREEN Communities and our own experience has indicated that by initiating the .GREEN string, the DotGreen Community, Inc. has brought value to the public and increased global interest in the new gTLD program. We have public community support, corporate interest, even interest and support from many of the governments in the GAC (Government Advisory Committee) who are counting on the DotGreen Community, Inc. to run this important public interest TLD.

The "name collisions" issue is not new and previously, many new TLDs have been introduced by registries with this issue existing and there have been no major problems.

I am in strong support of the comments submitted by the New TLD Applicant Group (NTAG) on 14 August, 2013. The NTAG, DotGreen Community, Inc., and the ICANN technical community are all interested in working to resolve this sudden assessment of an old issue and lessen risks associated with these name collisions. You can rest assured the DotGreen Community, Inc. is not interested in bringing risk to the security and stability of the Internet.

ICANN has an important timeline to consider, the ICANN's Draw Number system was presented and permitted through legitimate processes and community approval. As recommended in the NTAG letter, I fully agree that all new gTLD applicants not already identified as high risk, should immediately be assigned to the low risk category and be allowed to proceed through the agreed upon ICANN process as previously planned.

In Summary, this is the first time in all these years, working in and amongst this technical industry in a very public way, that the .GREEN TLD, a positive and popular public interest new gTLD with a great future in the DNS for Internet users, has been identified as allegedly posing a higher risk to the Internet than 80% of other new gTLDs. Could it simply be that the alleged risk associated with the names collision report was never recognized as a needed delay to the new gTLD program years ago by the hundreds of technical people working at the world's most capable registries and involved at ICANN because it isn't so? It may be that facts and risks recently assessed by a few from a single report may lack a perspective of proportion – leading to a harmful conclusion and followed by a flawed reaction to unfairly split the new gTLD program applications and cause delay.

I value ICANN's multi-stakeholder model, which allows even GREEN Internet stakeholders, this opportunity to request serious consideration of our community supported comments and new TLD application.

Kind Regards,



Annalisa Roger, CEO

DotGreen Community, Inc.

Single string applicant for the .GREEN Public Interest TLD

[www.dotgreen.org](http://www.dotgreen.org)