**Byron Holland**

**Comment on the Proposal for the Use of Mandatory Policy Advisory Boards for Regulated Industry Sector and Consumer-Trust-Sensitive New gTLD Strings**

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While I in general believe the idea of Policy Advisory Boards to implement safeguard advice for “sensitive string” gTLDs associated with regulated industries and professions to address the concerns expressed by the Governmental Advisory Committee (GAC) to be conceptually sound. In particular, we support the proposal of an entity made that includes broad representation to ensure consumer trust in the Internet.

 However, the following concerns regarding the practical implementation of such boards have been identified:

* **Funding:** In my opinion, any processes to safeguard the public interest with regard to the delegation of sensitive strings must balance the need of ensuring consumer trust and confidence in the Internet with the need to minimize the impact of the liabilities on new registries. Requiring gTLD applicants to fund the activities of the PAB constitutes a change in the application process since the call for new gTLDs was released in 2012. Registries should not be burdened by excessive administration costs.
* **Membership:** The proposed membership includes representation from at least three groups that could be considered special interest groups: advocates, consumers and benefitting organizations, and constituent groups. While broad participation on the Board will be critical to its credibility and success, an over-representation of organizations that come to the table with an agenda or entrenched positions will be detrimental to the decision-making process.
* **Decision-making processes:** Consensus decision-making is a hallmark of the multi-stakeholder process, and must be utilized in decisions about sensitive string gTLDs. However, it is also a challenging process when there is a diversity of opinions involved. With the proposed membership that includes numerous advocacy groups, I believe that consensus will be difficult to achieve. To ensure decisions are made in the best interest of the public, they must be based in evidence. For this reason, decisions must be based in impartial and unbiased research into the impact of sensitive string gTLDs on regulated industries and professions, as well as the public interest.
* **Definitions of regulated industries and professions: The** same legal frameworks that apply for the use of sensitive strings involving regulated industries in the ‘offline world’ must also apply in the ‘online world’. However, protocols for verifying and licencing regulated industries vary widely among nations and global regions. The identification of expert members with the ability to accurately and effectively represent a regulated industry or profession, such as .DOCTOR, will prove difficult. Furthermore, registries should have a degree of flexibility in how they implement the safeguards, recognizing national legal frameworks.