Comments of India on Amendment to the Base New gTLD Registry Agreement

[1] Section 2.4 (Monthly Reporting)
A link to IANA Registrar database that signifies Registrar IDs 9995 and 9996 should also be added which could be accessed at:
https://www.iana.org/assignments/registrar-ids/registrar-ids.xhtml#registrar-ids-1

[2] Section 2.9 (Registrars)
Capitalize the “registry-registrar agreement” in the phrase “Subject to the requirements of Specification 11, Registry Operator must provide non-discriminatory access to Registry Services to all ICANN accredited registrars that enter into and are in compliance with the Registry-Registrar agreement for the TLD;”

[3] Section 2.9 (Registrars)
As proposed, even though Registry Operator doesn’t need to take approval from ICANN regarding the pricing terms of Registry-Registrar agreement, it should atleast notify ICANN about the same. This (notifying ICANN) should be mentioned explicitly in the section 2.9 of 2016 global amendments to the base Registry Agreement.

[4] Section 6.7 (Fee Reduction Waiver)
There is no explanation about:

  i)   How ICANN would grant fee reduction waivers to Registry Operators ("at its sole discretion")
  ii)  Whether ICANN would publicly disclose these waivers or not
  iii) What would be terms and conditions for such fee waivers