

The ECLID Network (European Cultural and Linguistic Internet Domains) which currently represents the .bzh, .cat, .eus, .gal and .scot projects, appreciates the opportunity to provide comments with regard to the development of Qualified Launch Programs for new gTLD Registries.

ECLID welcomes ICANN's proposal for the Qualified Launch Program Addendum. We believe this Addendum to be a step in the right direction to enable applicants to both develop specific launch plans to accommodate part of the launch plans developed in their applications and to promote the TLD prior or during the sunrise. We also think that this addendum is specially relevant to those gTLDs that are community based

Many community applicants developed launch plans with a diversity of priority layers in their applications in what meant a commitment to offer specifically tailored launch programs that would be more respectful to the interests of the community they are serving.

These launch plans include in many cases a program to offer community relevant third parties the possibility to register domain names prior to the Sunrise Period. These programs were planned along the same lines developed by the proposal developed in the Qualified Launch Program Addendum.

This Addendum establishes in its Clause 2.2 the following:

2.2 If the TLD application was designated by ICANN as a geographic name (according to the criteria in section 2.2.1.4.1 of the Applicant Guidebook), to a registrant who is an international, national, regional, local or municipal governmental authority ("**Public Authorities**") and such QLP Name is either (i) identical to the name or acronym of such Public Authority or (ii) the name of a building, park, monument or other public place operated by such Public Authority. Except as permitted by this Section 2.2, if a QLP Name matches a label contained on the Sunrise List, such QLP Name MUST NOT as part of the Qualified Launch Program be Allocated or registered to a registrant who is not a Sunrise-Eligible Rights Holder with a valid SMD file for a label that matches the QLP Name.

Although the applications represented here by ECLID (.bzh, .eus .gal and .scot) can not be regarded as geographical by ICANN definition, they are community applications that are composed of or have received the support of many of the relevant entities that embody the communities represented.

Furthermore, these applications have received a clear and decided endorsement from the relevant Public Authorities in the areas where these communities have a strong

presence. This endorsement is a reflection of the interest and approval of the relevant Public Authorities of the projects developed by these applicants in the application phase, including the specifically tailored launch plans described above.

We therefore believe that the provisions set forth in Clause 2.2 should be applicable to those community applications that have received this support. The extension of Clause 2.2 applicability to these applications would only be in consonance with the rationale behind this clause. It would allow these applicants to develop part of the plans declared in the application phase (approved by ICANN) and endorsed by the relevant Public Authorities, taking into account the geographical remit that this endorsement bears, which we believe is the ultimate criterion behind the rationale of Clause 2.2.

We request ICANN to amend this clause to include these applications.

We also believe that names that are relevant for the most representative entities of a community should be also considered part of the exception provided by Clause 2.2, given the community TLDs' specific mandate to enhance and promote the represented community on the Internet, and the role some community entities play in this regard. In the applications herein represented by ECLID, their linguistic and/or cultural scope should be taken into account within the Clause 2.2 scope, in order to accommodate entities as relevant to these applications as, i.e., Universities, Language Regulators, publicly sanctioned Cultural entities, etc. that may not have any trademark for their names, given the lack of necessity due to their distinctiveness, or the impossibility, in some cases, due to the entity's nature and name.

We also support the comments provided by the Geographic Name Applicants Group, submitted on Feb. 28th, 2014, and the comments submitted by the Government of Scotland on March 13th, 2014., both expressing similar concerns about Clause 2.2.

We also want to echo the Geographic Name Applicants Group comments regarding:

- A. the extension of the categories of the names covered under Clause 2.2, to include registrants that may not be a Public Authority, but an entity under Public oversight serving the public interest.
- B. the inclusion of a phrase that may allow registrations of QLP names that may not be identical but may be a common term to refer to the name of the Public Authority or entity or landmark.
- C. The inclusion of "Public Services"
- D. The inclusion of geographical subdivisions.

We also request that all names included in 2.2 may be allowed to be translated into the TLD relevant language or script.

Respectfully submitted

Nacho Amadoz
Chair

ECLID

<http://pointbzh.com>

<http://fundacio.cat>

<http://puntueus.org>

<http://puntogal.org>

<http://dotscot.net>