Comments on "Independent Review of Trademark Clearinghouse Services Draft Report"

1. Whether ICANN TMCH services cater to just trademarks or other IPR (Intellectual Property Rights) also (like copyrights, patents etc.) may be specified in the report.

2. The IETF technical specification counterpart i.e. RFC or an Internet draft that will become a standard for ICANN TMCH services may be specified in the report. For example, the following Internet draft written by ICANN's Gustavo Lozano seems to be a candidate:

   draft-ietf-regext-tmch-func-spec-01 (https://datatracker.ietf.org/doc/draft-ietf-regext-tmch-func-spec/)

   Mentioning this in the report will help stakeholders in understanding existing or proposed architecture and technical implementation of the processes and interactions amongst TMCH services, Registries, Registrars etc.

3. It has been mentioned in the draft report executive summary that "Limitations of our data do not allow us to definitively conclude whether Claims Service notifications have a deterrent effect on either type (good/bad faith registrations) of registration activity."

   This is a very important parameter to conclude. More data on this should be collected, analysed and conclusions should be brought out in the report.

4. Whether TMCH services cater to or will cater to legacy gTLDs (.com, .net etc.) or not may be specified in the report.

5. The procedure by which the "Analysis Group" was chosen as the agency to assess the effectiveness of Trademark Clearinghouse (TMCH) services may be specified in the report. The other organizations considered apart from "Analysis Group" may also be specified.

6. The procedure by which the IBM and Deloitte were chosen as the organizations to maintain TMCH database / validate TMCH records may be specified in the report. The other organizations considered apart from IBM and Deloitte may also be specified.

7. It may be specified whether which technology was utilized for doing data analysis on various records (TMCH records, WHOIS records, surveys etc.) for TMCH review (i.e. big data analytics etc.)