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The Internet Corporation for Assigned Names and Numbers
Rod Beckstrom, CEO
Peter Dengate Trush, Chairman
4676 Admiralty Way, Suite 330.
Marina del Rey, CA 90292
USA

Dear Rod, dear Peter.

After careful consideration, EuroDNS SA (Registrar ID: 1050) is submitting the following comments on **ICANN's Expression of Interest on new gTLDs** ("EOI"). Having participated in the Expression of Interest workgroup ("WG") this Fall, EuroDNS is now convinced an EOI could be a tremendous opportunity to move the new gTLDs process ("the Process") forward *providing* it allows for a quicker turnaround and does not add yet another time-consuming layer of complexity.

Now more than ever, EuroDNS believes anything that would ensure that new gTLDs applications are actually processed in 2010 is worth trying. The EOI is a clear way forward for the Process and, as a result, it should be adopted and facilitated. Although overarching issues still stand and the applicant guidebook is still in draft, we believe the EOI should move forward in parallel as much as possible.

More detailed answers on specific questions asked in the Public Comment Announcement are respectfully submitted below.

I. Overall support

Allowing the public to determine a list of potential TLDs before the Process finally starts is certainly the best way to "accurately represent the level of interest in new gTLDs" since it would show that potential applicants care enough to follow yet another step in the process and "put money on the table" (see below). It would also allow for a much better planning in sales and marketing resources for Registrars which would, in turn, be able to provide far better information to their customers. Additionally, the EOI would also give a more accurate snapshot on the Root overload that more and more people seem to fear.

For these reasons among many others, EuroDNS does support the EOI with the caveat expressed above: the EOI should be used as a "fast track" (knowing more, in advance) and not as yet another layer of complexity and/or reason to delay the Process even further.

II. Submission Fee

The anticipated fee of USD 55,000 seems reasonable and should help the overall credibility of the EOI process: after so many years of talks and anticipation, it would allow potential applicants to “put their money where their mouth is” while discouraging “fantasy” applications.

Total costs for running a TLD are much higher than USD 55,000 anyway, therefore we see the number as comparatively low enough so start-up enterprises would not be deterred from participating in the EOI.

III. Mandatory Nature

The main advantage of the EOI would be to know the TLD landscape before the application process starts for good. As a result, its mandatory nature should be obvious: if there is a choice not to participate, then the lack of clarity will prevail and render the EOI almost useless.

If there is a significant opposition against the EOI, the process should be cancelled altogether; an “à la carte” approach would be extremely counter-productive.

IV. Refunds

EuroDNS believes costs of the EOI should be reasonably high to deter “fantasy” applications. Similarly, the possibility to lose the application money should preclude non serious applicants from polluting the process, which would allow a much faster turnaround with fewer applications to be processed. If the EOI is refundable each and every time, the application fee becomes irrelevant and we lose that key advantage. Therefore the rule should be non-refundable fees for the EOI.

However, serious applicants should not be “victims” of the ICANN process. As a result fees should be refunded if ICANN itself stops the process or does not commit to a specific and reasonable time frame. There should be less than a year between the EOI and the full application period.

V. Communication Period

Since we want the EOI to be compulsory, fairness dictates that a variety of stakeholders are properly informed so they can participate – even outside of the usual “ICANN community”. However, time and resources already devoted (articles and ads in the press, interviews, countless international meetings over the years) to the process mean that any interested party is probably already informed. Registrars do inform their customers regularly of the ICANN process as well.

As a result, we do not see a need to a specific communication period, especially since it could be seen as yet another unnecessary delay in the Process.

VI. Publication of Data

For the EOI to be useful it should allow to get a clearer picture of the future landscape. As such EuroDNS believes that, as a general rule, the string that would compose the TLD should be published as well as the number of applications for any particular string. To know whether the application is “community-based” would be quite necessary as well, given the special status they are granted in the Process.

Although EuroDNS would be in favour of full disclosure, applicants should have the option to hide their affiliation or at the very least to keep it strictly confidential to ICANN so as not to discourage participation to the EOI on that basis alone.

Because confidentiality may be even more important for brand owners, they could also have the option to hide those particular TLD strings from the general public. In that case, ICANN should commit to disclose the (aggregated) total number of “brand TLDs” that have chosen to participate in the EOI so as to give a global view of this specific category of TLD to the ICANN community.

We believe knowing the geographical region of a particular string might be helpful as well yet does not really void confidentiality concerns.

* * *

We are convinced the EOI would go a long way to provide clarity, both in the current market and on what to expect in the next few years. Moreover, even without the slightest interest in new gTLDs, any Registrar should find useful to know the potential, finite number of future gTLDs, since it would help better advising customers and devote marketing budgets.

At the end of the Seoul meeting, the ICANN board has shown it could listen to the Community it represents and move fast when innovative ideas were presented. An observer to the EOI WG, EuroDNS clearly supports the Process and sincerely hopes this effort will bear fruits to provide a much needed clarity and – finally – speed-up the Process.

Yours, sincerely,



Jean-Christophe Vignes

Executive Vice-President & General Counsel