

dotKöln comments on the draft Expression of Interest (EOI) / Pre-Registrations model

We welcome the EOI as an important step towards realization of new generic Top-Level-Domains. After a long time and many discussions the EOI is going to bring at least some momentum into a slow process.

The EOI process should enhance a rapid progress with the actual program and not lead to further, intolerable delays and uncertainties for both the internet community and the potential new TLD registries around the globe. Its primary target must be to provide valid information and thus support the rapid resolving of the remaining key open issues.

The EOI process must NOT provide an opportunity for speculators and gold diggers looking for a quick buck.

My comments are:

- 1.) The EOI should not be mandatory. Those seriously interested are going to participate in a voluntary EOI and will thus deliver the expected information on the level of serious interest in the program. If needed, the participants in the EOI may be granted a preferred treatment in the application round. Possible incentives might be regular applicant-only briefing, personal meetings with ICANN staff (1to1) and other services that will not be available to non-participants in the EOI.
- 2.) A voluntary contribution of valuable information provides stronger community based "crowd sourcing power" than the mandatory alternative and thus be more in line with ICANN's bylaws and the established bottom-up, consensus based gTLD process.
- 3.) The questions 1- 14 in the DAG V3 are able to provide sufficient information on the potential applicants and the expected strings and thus contribute to solving some of the open issues. So I regard them as being completely sufficient for the EOI.
- 4.) A publication of all EOIs is an absolute must! The information should be made public immediately after closing of the EOI window. With respect to the confidential and strategic nature of the information for many if not most of the participants to be published these should be anonymized. ICANN will have the information needed to achieve the above mentioned goals and the potential applicants have sufficient security to keep their business information confidential at their discretion.

- 5.) We agree with the necessity of a reasonable deposit for participants in the EOI. The proposed amount of 55,000 USD should not be exceeded. The deposit has to be refunded (including interest!), if the application window for new gTLDs is not opened within 6 months after closing of the EOI period. That should provide enough time for ICANN staff to consolidate the information gathered and solve the remaining key open issues.
- 6.) The communications campaign should start immediately and inform the community in general about the EIO and regularly provide updates on processes and decisions.

Summing up, we hope that ICANN is going to create a slim, result driven EOI process that will speed up the introduction of new gTLDs instead of creating further obstacles and delays. The New gTLD process has to be completed as soon as possible - this will support and strengthen faith in ICANN's ability to foster both competition and consumer choice and the innovative power of the internet.

Thank you very much for the opportunity to comment on and participate in that process.

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