

A Comment by the State of Bavaria on Geo Prioritization

To Whom It May Concern,

The State of Bavaria is thankful for the opportunity to comment on the newly proposed prioritization drawing method for prioritizing applications for evaluation, and ultimately, delegation. State of Bavaria supports the application of Bayern Connect GmbH for the top level domain “.bayern”.

The State of Bavaria is concerned about the public interest not being represented properly in the current drawing method. Prioritizing “IDN Top Level Domains” (IDNs) is indeed aiming in the right direction to promote public interest and to underline ICANN’s plan of a better global outreach, nevertheless, we strongly want to point out that “Geographical Name Top-Level Domains” (GeoTLDs) should be processed in a similar way.

ICANN, as the global guardian of the Domain Name System, has the responsibility to ensure a fair balance between public and private interests. GeoTLDs are important to the respective local communities all over the world. Therefore GeoTLDs heavily support ICANN’s plan of improved global outreach. GeoTLD applicants clearly operate in the public interest and ICANN should acknowledge the support they received by the relevant local authority that was elected by the public to serve them and act in their interest.

In our view, the proposed drawing method could disrupt this balance between public and private interests, as there is a great chance that Geo applications, clearly acting in the public interest, may be entering the root far behind applications that do not represent the public interest.

Therefore we ask ICANN to add GeoTLDs in its prioritization plan. The prioritization of the 56 GeoTLDs (7 of the 63 GeoTLD applications are IDNs and already prioritized) would defer the allocation of other generic TLDs only for a short period of time. We think this is reasonable to protect the global public interest.

Sincerely yours,

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