**Comment on the Draft Applicant Guidebook by .köln**

We are a new initiative that evaluates a possible application for the city of Cologne in Germany. Cologne has been known as Colonia Claudia Ara Agrippinensium or simpler Colonia Agrippina in the times of the Roman Empire, when it was the largest city north of the Alpes, and today bears the German name Köln. So while we consider to apply for .köln, it appears to be quite reasonable to also register .koeln for the sake of anybody who is not familiar with German umlauts and .cologne as it is the name under which our city is known throughout the world.

This is the background for our comment on the proposed

**Evaluation Fee and Annual Fees**

Our potential application is based on a community of a few million people.

It will serve the public interest by creating second-level domains and connected services that add value for governments, authorities, and the people making up our community.

The proposed US$ 185,000 evaluation fee is meant for one gTLD string per application. In many cases, the native names of a geographic location such as cities and regions are different from their names in other languages and scripts. There may be several variations for one and the same location, in particular if the place is in the non English speaking world, such as Milano or Mailand or Milan, or München, Muenchen or Munich. It seems rather unapproriate to be charged multiple evaluation fees for applications that are basically for one string even if that particular string comes in several shapes.

The same argument holds true with regard to the proposed US$ 75,000 minimum annual fees. This fee is likely to distort the business models and put high economic pressure on TLDs aimed at smaller communities. Considering the scenario of several strings for the same place, this would add to a virtual prohibition of any such application.

> **Comment 1: community-based GeoTLDs with the name of a public authority should pay application fees of not more that US$ 50,000 for applications even if the string comes in several forms. The minimum annual fees should not be more than US$ 25,000.**
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> **Comment 2: if a GeoTLD with the name of a public authority applies for it's name in IDN variants, translations and transliterations there should be a reasonable discount.**
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> **Comment 3: if a GeoTLD with the name of a public authority applies for it's name in IDN variants, translations and transliterations and all strings resolve to the same domain names only one annual fee should be applicable.**