New gTLD Subsequent Procedures PDP Update #5

Status of Public Comments Review

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16 December 2020

PURPOSE OF UPDATES

Draw attention to selected public comments received during Aug-Sep 2020 PC proceedings:

- Treatment of ALAC Comments
- Other comments of interest
- SubPro PDP WG leanings

To determine & record what CPWG resolves to do in response:

1. ALAC Advice
2. ALAC Statement
3. Monitoring +/ Comment
4. No further action
5. Other?

SUBPRO TOPICS COVERED

as at 16.12.2020

1. 0. General Comments
2. 2. Predictability
3. **17. Applicant Support**
4. 32. Limited Challenge/Appeals Mechanism
5. 12. Applicant Guidebook
6. 13. Communications
7. 14. Systems – opt-in update system
8. 20. Application Change Requests
9. 24. String Similarity Evaluations – 'intended use'
10. **35. Auctions & Private Resolution of Contention Sets**
11. 15. Application Fees
12. 36. Base Registry Agreement
13. **31. Objections – ALAC Standing in Community Objections**
14. 30. GAC Early Warning & GAC Consensus Advice
15. 28. Role of Application Comment
16. **9. Registry Commitments (Public Interest Commitments & Registry Voluntary Commitments) – DNS Abuse, Enforceability**
17. **34. Community Applications (+ Community Priority Evaluations) - Community participation, lowering threshold**
18. 41. Contractual Compliance
19. 37. Registrar Non-Discrimination / Registry/Registrar Standardization
20. 38. Registrar Support for New TLDs
21. 25. Internationalized Domain Names
22. 6. RSP Pre-Evaluation
23. 27. Applicant Reviews
24. 39. Registry System Testing
25. **1. Continuing Subsequent Procedures – program assessment, Board action on CCT-RT recommendations**
26. 3. Applications Assessed in Rounds
27. 5. Application Submission Limits
28. 16. Application Submission Period
29. 19. Application Queueing
30. 26. Security and Stability
31. **29. Name Collisions**
32. 11. Universal Acceptance
33. 40. TLD Rollout
34. 18. Terms and Conditions
35. 22. Registrant Protections
36. **7. Metrics and Monitoring - completeness**
37. **23. Closed Generics – ban, guardrails?**
38. 21. Reserved Names
39. **21.1 Geographic Names at Top Level**
40. 4. Different TLD Types
41. 8. Conflicts of Interest
42. 10. Application Freedom of Expression
43. 33. Dispute Resolution Procedures After Delegation

Recap SUBPRO TOPICS identified for

1 ALAC Advice

2 ALAC Statement

See: Comment-only Googledoc
(1) Draft ALAC Advice to the ICANN Board on Subsequent Procedures; and
(2) Draft ALAC Statement for SubPro PDP Final Report

Issue:	Resolved / Action:
30. Objections	
• **ALAC Standing for Community Objections**	• Advocate for automatic standing so that objection be considered on merit without risk of dismissal on 'lack of standing' being an impediment to ALAC/At-Large role vis a vis individual end-users
9. Registry Commitments (PICs & RVCs)	
• **DNS Abuse Mitigation**	• Reiterate position on need for SubPro recommendations on DNS Abuse

Recap SUBPRO TOPICS identified for

1 ALAC Advice

See: Comment-only Googledoc
(1) Draft ALAC Advice to the ICANN Board on Subsequent Procedures

Issue:	Resolved / Action:
29. Names Collisions • NCAP Studies 2 and 3	To reiterate position on NCAP Studies 2 and 3: • Board to consider recommendations of SSAC resulting from NCAP Studies 2 and 3. approve them for implementation prior to next round commencement • If the application period for next round commences before NCAP Studies 2 and 3 are completed or if resulting recommendations – as approved by Board - are not yet implemented, then delegation of any applied-for string with risk of name collision must withheld until such recommendations are addressed in implementation (to secure applicant commitments, if any)

SUBPRO TOPICS identified for

1 ALAC Advice

2 ALAC Statement

See: Comment-only Googledoc
(1) Draft ALAC Advice to the ICANN Board on Subsequent Procedures; and
(2) Draft ALAC Statement for SubPro PDP Final Report

Issue:	Resolved / Action:
17. Applicant Support + 35. Auctions	
• **ASP Objectives & evaluation**	• Reiterate concern on lack of clear objectives for ASP, which prevents its proper evaluation – CCT Rec #29: Objectives for Global South – CCT Rec #32: Revisit ASP

• **Community participation in Dedicated IRT**
  • IG 17.5: A dedicated IRT should be established and charged with developing implementation elements of ASP by revisiting 2011 Final Report of Joint Applicant Support WG, 2012 implementation of ASP
  • Risk of gaming – assessing willful gaming + penalty
  • Bid Credit details for AS qualifier in auctions (+35. Auctions)
	• Reiterate concern on lack of policy guidance for implementation
	• Seek assurance for ALAC/At-Large participation in Dedicated IRT
	  • Given that ALAC was co-charterer for JAS WG
	  • Community input is essential, especially in light of this IRT's wide scope (including implementation of the Bid Credits for AS qualifiers in auctions as the contention resolution mechanism of last resort)

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

1. **34. Community Applications (+ Community Priority Evaluations) - Community participation, lowering threshold**
2. 21.1 Geographic Names at Top Level
   - +14. Systems – opt-in update system
3. 9. Registry Commitments (Public Interest Commitments & Registry Voluntary Commitments) - Enforceability
   - +24. String Similarity Evaluations – 'intended use'
4. 23. Closed Generics – ban, suspension, guardrails?
5. 1. Continuing Subsequent Procedures – program metrics, Board action on CCT-RT recommendations
   - +7. Metrics and Monitoring
6. 35. Auctions & Private Resolution of Contention Sets

SUBPRO TOPICS identified for

1 ALAC Advice

2 ALAC Statement

See: Comment-only Googledoc
(1) Draft ALAC Advice to the ICANN Board on Subsequent Procedures; and
(2) Draft ALAC Statement for SubPro PDP Final Report

Issue + Updates:	Status / Proposed Action:
34. Community Priority Evaluation (CPE)	

Process, criteria, guidelines reform
• Avoid bias towards economic-driven groupings
• More grassroot participation and expertise in evaluation panels
	• Status:
	  • Amended IG 34.4 – added provision for "members" to be interpreted broadly; also that non-economic communities to have equal opportunity for full points; 1 point possible for communities with less than clear and straight-forward membership
	  • New IG 34.2 – Requisite "awareness and recognition" must take into consideration the views of relevant community-related experts, especially in cases where recognition is not measurable *or where awareness is difficult to measure*

• Lowering of threshold to prevail in CPE	• SubPro PDP WG Leadership suggests lowering of threshold from 14 of 16 points (87.5%) to 75%-80% (based on 4 existing but adjusted Criteria) • Proposed Action: 4 No further action

• Greater community participation in ICANN's engagement of a CPE service provider/panellists:
  • (i) development of criteria to evaluate and select candidates;
  • (ii) shortlisting of identified candidates;
  • (iii) final selection process; and
  • (iv) terms for inclusion into the contract
	• Status: SubPro PDP WG Leadership suggests *"the process to develop evaluation and selection criteria for CPE Provide must include mechanisms to ensure appropriate feedback from ICANN Community. Also, terms included in contract must be subject to public comment"*
	• Proposed Action: Inclusion of shortlisting and final selection be subject to community input
	1 ALAC Advice 2 ALAC Statement

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue:	Status / Proposed Action:
21.1 Geographic Names at Top Level + 14. Systems	• Status: No change to WT5 Final Report • Proposed Action: 1 ALAC Advice 2 ALAC Statement Reiterate:
• **Stronger protection for non-capital city names**	• Appreciation for adoption of 2012 implementation replacing 2007 policy (which had less protections for geonames) but disappointment in lack of support for expansion of AGB Terms • Non-capital city names (cities on established lists meeting certain criteria eg. relative population size ~100k residents, has airport with an IATA code) deserve preventive protection regardless of applicant's intent to use of TLD • Preventive protection to extend to qualified non-capital city names in ASCII, native script, in current and historical forms (eg. Kolkata/Calcutta)
• **Notification for Non-AGB Terms**	• Provision of a Notification Tool limited exclusively to GAC Members for informing on application for strings matching listed names with geographic meaning • Systems: Provide an opt-in update system for informing on application for specified strings

For Discussion

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue + Updates:	Status / Proposed Action:

9. Registry Commitments (PICs & RVCs)
• Enforceability, Bylaw conflict re:
PICs , String Similarity, Community
TLDs commitments & RVCs
	• Status: No substantive change to SubPro recommendations/IG
	• Proposed Action:
	1 ALAC Advice
	State positions
	• Any and all Registry Commitments incorporated in RA must be clear and enforceable
	• Enforceability a must whether is a/an
	  • PIC (i.e. mandatory per consensus policy); or
	  • RVC that is voluntarily proffered by applicant/RO *provided within ICANN's Mission?*; or
	  • RVC that is negotiated due to GAC Advice/EW or Application Comment or Objection *taken to fall within ICANN's Mission*
	• Clarity of Registry Commitments to be achieved by ICANN Legal, approved by ICANN Board to ensure enforceability *prima facie*
	  • *Subject to Accountability Mechanisms, PICDRP, litigation/arbitration*
	• Contractual Compliance to introduce/publish standards & threshold to assess registry (+registrar) practices - including guidelines on how each threshold is derived and applied
	(Explore joint advocacy with GAC, NCSG, IPC …)

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue + Updates:	Status / Proposed Action:

9. Registry Commitments (PICs & RVCs) +36. Base Registry Agreement
• Prohibition of fraudulent / deceptive practices in PIC or base RA
  • PICDRP requires evidence of harm
	• Status: SubPro PDP WG proposes to amend Rec 36.4 as follows:
	  • Confirm support for adding contractual provision stating RO will not engage in fraudulent / deceptive practices
	  • In event ICANN receives court order that RO has engaged in fraudulent / deceptive practices, ICANN may issue breach notice per Base RA
	  • In event there is credible allegation by any 3rd party of fraudulent / deceptive practices other than per court order, ICANN may at its discretion, either commence DRP actions under RA Art 5 or appoint a PICDRP panel. **For purposes of a credible claim of fraudulent / deceptive practices, only need to specifically state grounds of alleged non-compliance, but not of personal harm as result of RO's act or omission**.
	• Proposed Action:
	4 No further action

For Discussion

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue: Status / Proposed Action:

23. Closed Generics aka Exclusive Generics

- 3 Proposals
  - Little support for 2 extremes (allow vs ban)
  - Comments on CG support public interest goal angle
  - Disagreement on what is status quo if no recommendation made
    - Base RA Spec 11 3(d) RO of a "Generic String" TLD may not impose eligibility criteria for registrations limited exclusively to a single person or entity
    - GAC Beijing Advice "exclusive registry access to serve public interest goal"
    - Board interpretation of global public interest?

- Status:
  - No consensus SubPro PDP WG on ban / suspension / permissibility with or without guardrails,
    - Even with guardrails, no agreement on (a) how to define public interest, (b) who determines whether the application supported a public interest goal, and (c) how would such a requirement be enforced
  - Therefore no SubPro recommendation
    - *"If this issue were to be considered in future policy work, it should also involve experts in the areas of competition law, public policy, and economics. In addition, it should be performed by those in the community that are not associated with any past, present, or expectations of future work in connection with new gTLD applications or objections to new gTLD applications. Absent such independence, any future work is unlikely to result in an outcome any different than the one achieved in SubPro WG"*
- Proposed Action?

  1 ALAC Advice | 2 ALAC Statement
  - Support Closed Generics only if guardrails are included:
    - TLD must embody concept of Trust – a trusted source for whatever it is offering
    - Public interest requires that TLD must span and serve competitors – "competitors" and "competition" anathema to TLD operated in public interest
    - Board must be ultimate judge of public interest
    - Commitments embodied in application must be enforceable and RA renewal contingent on commitments being honoured
  - Explore joint advocacy with GAC, NCSG, BC?

For Discussion

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue:	Status / Proposed Action:

1. Continuing Subsequent Procedures +7. Metrics and Monitoring

- Program assessment
  - ALAC: Clear, measurable objectives to meaningfully evaluate Program – data measure competition, baseline metrics to measure consumer trust
  - ALAC, GAC Montreal Communique: CCT-RT prerequisite & high priority recommendations to be implemented prior to next round
- Board action on CCT-RT recommendations
  - Board resolutions of 31 Mar 2020 and 22 Oct 2020

- Status:
  - SubPro PDP WG noted input, understands required to consider all CCT-RT recommendations directed to it by ICANN Board resolutions, but is not necessarily required to agree with all outcomes and suggested solutions; and has addressed to extent relevant/possible
    - Rec 7.1: Meaningful metrics must be identified to understand the impact of the Program. To review metrics, data must be collected at a logical time to create a basis against which future data can be compared.
    - IG 7.2: Metrics collected to understand the impact of Program should, broadly speaking, focus on the areas of trust, competition, and choice. Notes that the CCT-RT 2018 Final Report includes a series of recommendations regarding metrics. Work related to the development of metrics should be in accordance with CCT-RT recommendations currently adopted by the Board, as well as those adopted in the future.
- Proposed Action:
  - To be discussed …
  - Explore joint advocacy with GAC

Board action on CCT-RT Recommendations designated to SubPro PDP WG 1/3

CCT-RT Recommendation	Board Resolution, 1 Mar 2019	Board Resolution, 22 Oct 2020	SubPro PDP WG
#9. Possibility of reducing costs related to defensive registration for small number of brands registering large number of domains.	Note and pass through to SubPro PDP WG and RPM WG		Refer to RPM WG
#12. Incentives and/or eliminate current disincentives for RO to meet user expectations through use of PICs, for: (1) content-gTLD connection; (2) DN registration restrictions in certain gTLDs (particularly in sensitive or regulated industries) and (3) safety and security of users' personal and sensitive info	Note and pass through to SubPro PDP WG		• Aff 9.3 - affirms the framework established by NGPC to apply additional Safeguards per GAC Beijing Communique • Rec 9.4 and 9.8, and IG 9.5-9.7 – all deal with evaluation of strings for safeguards
#14. ICANN Org to negotiate amendments to existing RA or have new RA for Subpro with incentives to adopt proactive anti-abuse measures #15. ICANN Org to negotiate amendments to existing RA and RAA to include prevention of systemic use of specific Ry or RO for DNS security abuse	**Pending**. ICANN Org to facilitate community efforts to develop definition of "abuse" to inform further action		**Rec 9.15 - acknowledges ongoing important work in the community on the topic of DNS abuse and believes that a holistic solution is needed to account for DNS abuse in all gTLDs as opposed to just subsequent procedures**
#16. Further study the relationship between specific RO-Rr-DNS Security Abuse -- data collection, including DAAR. For transparency, published info regularly to identify RO and Rs that need greater scrutiny, investigation, enforcement action → **Upon identifying abuse phenomena, have action plan to respond to such studies, remedy problems identified**, and define future ongoing data collection.	**Pending**. ICANN Org to conduct gap analysis to inform whether future ongoing data collection would be meaningful Note and pass through to Sub PDP WG and other groups	**Approve.** ICANN Org to continue collecting data, generate monthly reports. • DAAR is only a tool to monitor 3rd party reputation lists for DNS security threats concentrations	
#23. Gather data on new gTLDs operating in highly-regulated sectors – survey, audits etc	**Pending**. ICANN Org to provide report on volume and nature of complaints received for gTLDs operating in highly-regulated sectors to inform on next steps, need for audit, further information from contracted parties.	**Approve.** Directs ICANN Org to: • Conduct voluntary pilot survey to capture recommended data, review sample domain websites within highly-regulated sector • Monitor complaint trends, plan for audit if risk identified	• Aff 9.3 - affirms the framework established by NGPC to apply additional Safeguards per GAC Beijing Communique • Rec 9.4 and 9.8, and IG 9.5-9.7 – all deal with evaluation of strings for safeguards
#25. Treatment of voluntary commitments – must state intended goal, be submitted during application process. Should be made accessible in an organized, searchable online database	Note and pass through to SubPro PDP WG and ICANN Org		• Rec 9.12 - applicant must include its reasons and purposes for making such RVCs for adequate consideration by any entity or panel, objector, GAC • Rec 9.13 - RVCs must be readily accessible and presented in a manner that is usable • IG 9.14 - ICANN org should evaluate rec on accessibility, determine best method to implement

Board action on CCT-RT Recommendations designated to SubPro PDP WG 2/3

CCT-RT Recommendation	Board Resolution, 1 Mar 2019	Board Resolution, 22 Oct 2020	SubPro PDP WG
#29. Set objectives/metrics for applications from Global South [SubPro, GNSO] #30. Expand and improve outreach info the Global South [ICANN Org] #31. ICANN org to coordinate pro bono assistance program [ICANN Org] #32. Revisit Applicant Support Program [SubPro]	Note and pass through to Sub PDP WG and other groups **Accept #30.** • ICANN Org to report on related engagement, provide for resources in next budget cycle. • SubPro should help define "Global South"		• Rec 17.1 – o believes that the high-level goals and eligibility requirements for the ASP remain appropriate o recommends new types of financial support for subsequent procedures ~ coverage of additional application fees (Rec 17.2) and a bid credit, multiplier, or other similar mechanism that applies to a bid submitted by an applicant qualified for AS who participates in an ICANN Auction of Last Resort (Rec 17.15 and IG 17.16 and 17.17) o recommends ICANN facilitate non-financial assistance including the provision of pro-bono assistance to applicants in need • Rec 17.3 - ICANN improve outreach, awareness-raising, application evaluation, and program evaluation elements of the ASP, as well as usability of the Program • IG 17.4 - Outreach and awareness-raising activities should be delivered well in advance of the application window opening, as longer lead times help to promote more widespread knowledge about the program. Such outreach and education should commence no later than the start of the Communication Period • IG 17.5 - A dedicated IRT should be established, charged with developing implementation elements of ASP • IG 17.9 - Dedicated IRT should seek advice from experts in the field to develop an appropriate framework for analysis of metrics to evaluate the success of ASP

Board action on CCT-RT Recommendations designated to SubPro PDP WG 3/3

CCT-RT Recommendation	Board Resolution, 1 Mar 2019	Board Resolution, 22 Oct 2020	SubPro PDP WG
#33. Template for GAC consensus advice to Board regarding gTLDs	Note and pass through to SubPro PDP WG, GAC and ICANN Org		Rec 30.3 - per ICANN Bylaws, GAC Consensus Advice must include a clearly articulated rationale, be limited to the scope and elaborate on any "interaction between ICANN's policies and various laws and international agreements or where they may affect public policy issues." Where rationale is based on public policy considerations, well-founded merits-based public policy reasons to be articulated.
#34. Review of procedures and objectives for community-based applications	Note and pass through to SubPro PDP WG		• Aff 34.1 - affirms the continued prioritization of applications in contention sets that have passed • IG 34.2 – 34.9 • Rec 34.10 and IG 34.11-34.12 • Rec 34.13 – 34.16 + IG 34.17 • Rec 34.18 + IG 34.19
#35. New policies to avoid potential inconsistent results in string confusion objections: (1) string similarity in singular/plural versions of same string (2) similar dispute cases to be examined by same expert panelist (3) post-dispute resolution panel mechanism	Note and pass through to SubPro PDP WG		• Rec 24.3 - update the standards of both (a) confusing similarity to an existing top-level domain or a Reserved Name, and (b) similarity for purposes of determining string contention, to address singular and plural versions of the same word - prohibiting plurals and singulars of the same word within the same language/script in order to reduce the risk of consumer confusion • Rec 31.18 - ICANN must reduce the risk of inconsistent outcomes in the String Confusion Objection Process, especially where an objector seeks to object to multiple applications for the same string. • IG 31.19 - ICANN should allow a single String Confusion Objection to be filed against all applicants for a particular string, rather than requiring a unique objection to be filed against each application. • Rec 32.1 - ICANN establish a mechanism that allows specific parties to challenge or appeal certain types of actions or inactions that appear to be inconsistent with AGB

For Discussion

SUBPRO TOPICS identified for

3 Monitoring +/ Comment

Issue + Updates:	Status / Proposed Action:

35. Auctions & Private Resolutions of Contention Sets

- Second-price auction model with sealed bids (departure from Vickrey auction)
- No details on Bid Credit for ASP qualifier – to be dealt with by IRT
- Private resolutions beyond forming JV, business combinations, still allowed but subject to
  - Bona fide intent affirmation to operate TLD
  - Non-exhaustive factors to establish lack of bona fide intent but no penalty
  - Contention Resolution Transparency Requirements Reporting to ICANN Org on outcomes within 72 hours of resolution, "trade secrets" exempted; ICANN Org to publish within 72 hours of receipt

- Status: No change to SubPro PDP WG recommendations
- Proposed Action:

1 ALAC Advice | 2 ALAC Statement

  - Reiterate:
    - Opposition to private auctions
      - Concern about attempts to "game" application process through use of private auctions
      - Allowing shuffling of funds, i.e. the ability for a loser to apply proceeds from 1 private auction to another, only really benefits incumbent RO / multiple-string applicants; disadvantages single-TLD/niche applicants
      - No good reason for not mandating ICANN only auctions such that auction proceeds can be directed for uses in public interest – CCWG on Auction Proceeds
      - Bona fide intent affirmation, if at all, should apply to all applications, not just those in contention sets
      - Factors for establishing lack of bona fide intent too subjective, and without penalty, ultimately just mere "window dressing"
    - Second-price, sealed bid auction compromise, while superior to status quo, still inferior to a Vickrey auction solution
    - Transparency of terms of any private resolution absolutely necessary to gain data for program evaluation
  - Explore joint advocacy with NCSG, GAC

SUBPRO TOPICS tagged for

4 No further action

1. 0. General Comments
2. 2. Predictability
3. 32. Limited Challenge/Appeals Mechanism
4. 12. Applicant Guidebook
5. 13. Communications
6. 14. Systems – opt-in update system
7. 20. Application Change Requests
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27. 22. Registrant Protections
28. 21. Reserved Names
29. 4. Different TLD Types

- SubPro PDP WG Consensus Call
- Minority Reports / Statements
- Qualifications for

4 No further action

SubPro PDP WG Timeline

(as at 15 Dec)

17 December 2020
- Comments due to December 15 Redline
- Working Group Call (already on your calendars) to close out any last issues
- Content Freeze / Lockdown – Other than if there are any changes to close out last issues, all content is locked down for the Consensus Call

22 December 2020
- Final Report is released to the Working Group
- Commencement of Consensus Call

5 January 2021
- Consensus Call Ends

6 January 2021
- Designation of Levels of Support by Working Group Leadership Team

7 January 2021
- Call of the Working Group to discuss designations, answer questions

8 January 2021
- Challenges to Designation of Levels of Support by Working Group Leadership Team are due (if any)
- **Minority Reports (if any) are due**

11 January 2021
- Final Report delivered to the Council
- Document Deadline for discussion during January's GNSO Council Meeting

(as at 16 Dec, unofficially)

17 December 2020
- Comments due to December 15 Redline
- Working Group Call (already on your calendars) to close out any last issues
- Content Freeze / Lockdown – Other than if there are any changes to close out last issues, all content is locked down for the Consensus Call

22 December 2020
- Final Report is released to the Working Group
- Commencement of Consensus Call

8 January 2021
- Consensus Call Ends

11 January 2021
- Designation of Levels of Support by Working Group Leadership Team

12 January 2021
- Call of the Working Group to discuss designations

13 January 2021
- Challenges to Consensus Call Designations

18 Jan 2021
- **Minority Reports (if any) are due**
- Deliver Report to Council

21 January 2021
- GNSO Council Meeting

What we need to do

- Today: CPWG to complete its recommendations to the ALAC on positions for a (provisional) statement
- 22 Dec – 8 Jan: JC to participate in Consensus Call using said positions (where feasible or relevant)
- 13 Jan: Final Update to CPWG, and finalization of ALAC Statement based on confirmed consensus designations
- 14 – 17 Jan: ALAC to vote on statement
- 18 Jan: JC to submit ALAC Statement (i.e. Minority Report)