

2.3: Role of Application Comment				
#	Comment	Contributor	WG Response	Notes
<b>General Comments</b>				
1	<p><b>Supports Early Warning and AGB-consensus advice; welcomes dialogue to increase transparency and fairness; opposes the PDP making recommendations on GAC activities; notes that change to the likely operator of a gTLD should invoke notification requirement and possible re-evaluation, including public comment:</b> With regard to the role of Application Comment, the GAC reiterates its comments on GAC Early Warnings and other objections to proposed strings, as follows: "The GAC believes that the Early Warning arrangements applied in the recent gTLD round were a useful mechanism to identify applications that raise public policy concerns. This also applies to GAC advice to the Board and the specific "AGB-GAC consensus advice." They should be an integral part of any future rounds. Constructive dialogue through this process can help applicants better understand the concerns of governments and help governments better understand the planned operation of proposed gTLDs.</p> <p>The GAC would welcome the opportunity to discuss options to increase the transparency and fairness of these arrangements (including providing a rationale for objections and giving applicants subject to Early Warnings the opportunity for direct dialogue with the GAC). Any rationale provided by the GAC would be based on its role under the Bylaws to "consider and provide advice on the activities of ICANN as they relate to governments, particularly matters where there may be an interaction between ICANN's policies and various laws and international agreements or where they may affect public policy issues."</p> <p>However, the GAC does not consider that the PDP should make recommendations on GAC activities, which are carried out in accordance with the Bylaws and GAC's internal procedures." . . .</p> <p>. . . Accordingly, with regard to both the Role of Application comment and Change requests, the GAC believes that ICANN should enforce section 1.2.7 of the gTLD Applicant Guidebook to require applicants to disclose to ICANN any material changes or updates pertaining to their application, including any agreements whereby an applicant has agreed to transfer or seek ICANN's approval to transfer to another entity the right to operate a new gTLD that could be authorized in response to a pending application. As stated in 1.2.7 of the gTLD Applicant Guidebook: "If at any time during the evaluation process information previously submitted by an applicant becomes untrue or inaccurate, the applicant must promptly notify ICANN via submission of the appropriate forms." The GAC believes that a change to the likely operator of the new gTLD would constitute a material change in the application that invokes the notification requirement in 1.2.7 and that ICANN may require a re-evaluation of the application, including a new public comment period, for competition concerns. Implementing section 1.2.7 in this manner will serve the public interest by providing the GAC and other members of the public the opportunity to identify and comment at the earliest possible time in the new gTLD application process competition and other issues, such as security questions, that may depend on the identity of the new gTLD operator.</p>	GAC	<p>Comments (see column B) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
2	<p><b>Supports 2.3.c.1 and 2.3.c.2: Supportive of 2.3.e.1 and 2.3.e.3: The ALAC supports the WG's preliminary recommendations 2.3.c.1 to optimize the mechanisms and system for Application Comment and 2.3.c.2 for ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized.</b></p> <p>In pursuit of fairness, we are supportive of the idea of limiting the comment period for CPE to run parallel to the Initial Evaluation comment period. We also think it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose.</p>	ALAC	<p>Agreement (Supports the WG's preliminary recommendations 2.3.c.1 -- optimize the mechanisms and system for Application Comment; 2.3.c.2 -- ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized; 2.3.e.1 -- CPE to run parallel to the Initial Evaluation comment period; 2.3.e.3 -- applicants limited period to respond to late comments) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied to: 2.3.c.1, 2.3.c.2, 2.3.e.1 and 2.3.e.3
3	<p><b>Supports only requiring response when comment may impact scoring. Supports requiring verification of commenter. Believes longer comment period for community applications makes sense: The BC agrees with only requiring a response from an applicant when a comment may impact scoring. We would also advise requiring confirmation and verification of the identity of the commenter.</b> Identity of the commenter would not need to be disclosed to the public but anonymous or false identity used in submitting comments would appear to be another way to "game the system" and could financially impact an applicant unfairly.</p> <p>A longer comment period for community applications makes sense to allow for the communities impacted to become aware of the application and provide comments if appropriate</p>	BC	<p>Agreement (2.3.c.2 -- Requiring response when comment may impact scoring; 2.3.c.1 -- Verifying commenter; 2.3.e.1 -- longer comment period) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied to: 2.3.c.1, 2.3.c.2, and 2.3.e.1

4	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG	<p>Agreement (2.3.c.1 -- verifying commenter; 2.3.c.2 and 2.3.e.2 -- allow applicants to respond) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied to 2.3.c.1 and 2.3.c.2
<p><b>2.3.c.1: The Working Group supports continuing the guidance in Implementation Guideline C, particularly around the provision of comment forums. However, the Working Group believes that the mechanism and system could be further optimized.</b></p> <p>• <b>Implementation Guidance under consideration:</b> The system used to collect application comment should better ensure that the email and name used for an account are verified in some manner.</p> <p>• <b>Implementation Guidance:</b> The system used to collect application comment should support a filtering and/or sorting mechanism to better review a high volume of comments. The system should also allow for the inclusion of attachments.</p> <p style="text-align: right;"><b>START HERE FOR MEETING ON 04 MARCH</b></p>				
1	<p><b>Supports continuing guidance in Implementation Guideline C, use of verification methods, and inclusion of a filtering/sorting mechanism for comments:</b> [The Working Group supports continuing the guidance in Implementation Guideline C, particularly around the provision of comment forums. However, the Working Group believes that the mechanism and system could be further optimized.] The BRG supports the preliminary recommendation for continuing Implementation Recommendation C relating to the provision of comment forums during the application process. This provides the broader ICANN community an opportunity to submit feedback, positive or negative, about an application.</p> <p>[Implementation Guidance under consideration: The system used to collect application comment should better ensure that the email and name used for an account are verified in some manner.] During the last application round, it was not always clear who or which organisation submitted comments, as this information was not validated. The BRG agrees that the submitter of any comment must be captured and the source verified to minimise frivolous claims from being submitted, avoid comments by competitors with ulterior motives, and prevent repeated comments from the same source. ICANN should verify the source of comments where comments may have a material impact on action taken against a particular application.</p> <p>[Implementation Guidance: The system used to collect application comment should support a filtering and/or sorting mechanism to better review a high volume of comments. The system should also allow for the inclusion of attachments] The BRG agrees with the implementation guidance and believes that these enhancements would aid applicants in reviewing and prioritising the comments. Pre- determined categories of responses, based on experiences of the 2012 round, could help filter the comments for the applicant and the evaluation panels, identifying comments that could impact the scoring, or trigger clarifying questions. However, all comments should require substantiation of the issue as it pertains to the particular comment. The system should continue to allow applicants to respond publicly to comments, especially to correct any false assertions submitted in public comments. In this respect, time to respond to comments received towards the end of the comment period should be available to the applicant, e.g. a period of 7-10 days where the applicant has an opportunity to reply.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000005.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000005.html</a>)</p>	BRG	<p>Agreement (Supports continuing guidance in Implementation Guideline C, use of verification methods, and inclusion of a filtering/sorting mechanism for comments) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
2	<p><b>Supports recommendation:</b> The ALAC supports these proposed optimization to the application comment system.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
3	<p><b>Supports 2.3.c.1 and 2.3.c.2: Supportive of 2.3.e.1 and 2.3.e.3:</b> The ALAC supports the WG's preliminary recommendations 2.3.c.1 to optimize the mechanisms and system for Application Comment and 2.3.c.2 for ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized.</p> <p>In pursuit of fairness, we are supportive of the idea of limiting the comment period for CPE to run parallel to the Initial Evaluation comment period. We also think it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.] Copied from General Comments</p>	Copied from General Comments
4	<p><b>Supports implementation guidance:</b> [Re: Implementation Guidance] We support improved verification of name and email in the application comment collection system. The public comment process should be transparent and not used as a mechanism to try and 'sabotage' applications.</p> <p>[Re: Implementation Guidance] We support a filtering and/or sorting mechanism to better review a high volume of comments. We support the system allowing for the inclusion of attachments, so evidence for comments can be provided. We suggest that a form be used for collecting public comments to limit the elements of applications that can be commented on.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000011.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-sup-initial-30oct18/2018q4/000011.html</a>)</p>	IPC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	

5	<p><b>Supports implementation guidance:</b> The RySG supports continuing the guidance in Implementation C, specifically the provision of comment forums, which provides the broader ICANN community an opportunity to submit feedback, positive or negative, about an application.</p> <p>The RySG also believes that the submitter of any comment must be captured and the source verified to minimise frivolous claims from being submitted, avoid comments by competitors with ulterior motives, and prevent repeated comments from the same source. ICANN should verify the source of comments where comments may have a material impact on action taken against a particular application.</p> <p>The improved system functionality suggested would be welcomed by the RySG, as an aid to reviewing and prioritising the comments received by an applicant, especially where high volumes of comments are submitted. Predetermined categories of responses, based on experiences of the 2012 round, could help filter the comments for the applicant and the evaluation panels, identifying comments that could impact the scoring, or trigger clarifying questions. However, all comments should require substantiation of the issue as it pertains to the particular comment. The system should continue to allow applicants to respond publicly to comments, especially to correct any false assertions submitted in public comments. In this respect, time to respond to comments received towards the end of the comment period should be available to the applicant, e.g. a period of 7-10 days where the applicant has an opportunity to reply.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html</a>)</p>	RySG	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
6	<p><b>Supports only requiring response when comment may impact scoring. Supports requiring verification of commenter. Believes longer comment period for community applications makes sense:</b> The BC agrees with only requiring a response from an applicant when a comment may impact scoring. We would also advise requiring confirmation and verification of the identity of the commenter. Identity of the commenter would not need to be disclosed to the public but anonymous or false identity used in submitting comments would appear to be another way to "game the system" and could financially impact an applicant unfairly.</p> <p>A longer comment period for community applications makes sense to allow for the communities impacted to become aware of the application and provide comments if appropriate</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html</a>)</p>	BC	<p>Agreement (verification of commenter) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments
7	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG	<p>Agreement (verification of commenter) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments
5	<p><b>Provides clarity about how system was designed in 2012 and suggests prelim recommendation should be considered with that context:</b> (2.3.c.1) Preliminary recommendation 2.3.c.1 states that the Application Comment tool "should better ensure that the email and name used for an account are verified in some manner" and support "filtering and/or sorting."</p> <p>ICANN org would like to make the PDP Working Group aware that the Application Comment tool already provides these features. In order to submit a comment, users must first create an account by providing name, email address, and optionally affiliation. The system sends an email to the email address provided and affirmative confirmation from the email address must be received by the system before an account is created. The Application Comment tool also allows sorting of all of the columns of information (i.e., applicant, string, application ID, name of person who submitted the comment, subject of the comment, evaluation panel or objection ground the comment is directed to, and date of submission). A search by application status, applicant, string, evaluation panel or objection ground the comment is directed to, and name of person who submitted the comment can also be performed.</p> <p>Preliminary recommendation 2.3.c.1 also suggests that the Applicant Comment tool allows for attachments to be provided. ICANN org would like to note that attachments are not searchable and sortable, which appears to conflict with the intent of the preliminary recommendation to make viewing of comments easier. Allowing for attachments would also mean more information that the evaluation and objection panels would need to review, impacting application processing costs and timelines. The PDP Working Group might want to take this into consideration as it continues discussions on this topic.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000009.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000009.html</a>)</p>	ICANN org	<p>Agreement (Supports the recommendations -- but notes that the Application Comment tool already provides these features) Concerns (about problems with searching and sorting of attachments) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p><b>2.3.c.2: ICANN should be more explicit in the Applicant Guidebook on how public comments are to be utilized or taken into account by the relevant evaluators, panels, etc. and to what extent different types of comments will or will not impact scoring. In addition, to the extent that public comments are to be taken into account by the evaluators, panels, etc., applicants must have an opportunity to respond to those comments.</b></p>				
1	<p>dotgay LLC fully supports this recommendation.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html</a>)</p>	dotgay LLC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	

2	<p><b>Supports recommendation, provides rationale:</b>The ALAC supports this preliminary recommendation on the basis that:</p> <p>-- It provides greater clarity to the application process, identifies the need and avenues for remediation and possibly inclusion of voluntary Public Interest Commitments (PICs); and</p> <p>-- Subject to timing issues, it would in principle assist in an applicant's preparations for responding to comments that could help with the remediation process.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
3	<p><b>Supports 2.3.c.1 and 2.3.c.2: Supportive of 2.3.e.1 and 2.3.e.3:</b> The ALAC supports the WG's preliminary recommendations 2.3.c.1 to optimize the mechanisms and system for Application Comment and 2.3.c.2 for ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized.</p> <p>In pursuit of fairness, we are supportive of the idea of limiting the comment period for CPE to run parallel to the Initial Evaluation comment period. We also think it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments
4	<p><b>Supports recommendation:</b> We support this recommendation. Explicitly defining the role of public comments will assist with the predictability and transparency of the evaluation process.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html</a>)</p>	IPC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
5	<p><b>Provides clarity about how system was designed in 2012 and suggests prelim recommendation should be considered with that context:</b> Provides clarity about how (2.3.c.2) Preliminary recommendation 2.3.c.2 states that "ICANN should be more explicit in the Applicant Guidebook on how public comments are to be utilized or taken into account by the relevant evaluators, panels, etc. and to what extent different types of comments will or will not impact scoring."</p> <p>It would be helpful if the PDP Working Group could clarify what is meant by being "more explicit" in how different types of comments will or will not impact scoring. In the 2012 round, it was the job of the evaluation and objection panels to review and determine the relevance of the comments, as well as whether they impact evaluation scores or the objection. Section 1.1.2.3 of the Applicant Guidebook states: "Evaluators will perform due diligence on the application comments (i.e., determine their relevance to the evaluation, verify the accuracy of claims, analyze meaningfulness of references cited) and take the information provided in these comments into consideration." As it relates to objections, this section of the Application Guidebook states: "These comments will be available to any may be subsequently considered by an expert panel during a dispute resolution proceeding." Is it the view of the PDP Working Group that new rules and guidelines should be developed to govern the review and determinations of application comments? If yes, what should those new rules and guidelines be?</p> <p>Preliminary recommendation 2.3.c.2 also states: "[T]o the extent that public comments are to be taken into account by the evaluators, panels, etc., applicants must have an opportunity to respond to those comments." Section 1.1.2.3 of the Applicant Guidebook states: "In cases where consideration of the comments has impacted the scoring of the application, the evaluators will seek clarification from the applicant." Accordingly, evaluation panels (except for Community Priority Evaluation (CPE) which has its own processes and procedures) issued clarification questions if a comment is determined to have a potential impact to the score of the application.</p> <p>Given this, it would be helpful if the PDP Working Group could clarify the new requirement being recommended (i.e., is the new recommendation that clarifying question opportunities be extended to CPE applications if an application comment impacts scoring of the application?) Applicants were allowed to submit changes to their applications to address the clarifying questions. Is it envisioned that CPE applicants would be afforded the same opportunity? If so, considerations should be given to the objective of the CPE process and whether that objective can be achieved if CPE applicants are given opportunities to amend their applications. Considerations should also be given to the impact to other related processes (i.e., community objection, GAC advice), and how interested stakeholders can participate/engage meaningfully in the processes.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000009.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000009.html</a>)</p>	ICANN org	<p>Agreement (but requesting clarifications in the context of the 2012 process) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
6	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG	<p>Agreement (Support for applicant to respond) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments

7	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. <b>Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</b></p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG	<p>Agreement (Supports allowing applicants to respond) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
8	<p><b>Supports only requiring response when comment may impact scoring. Supports requiring verification of commenter. Believes longer comment period for community applications makes sense:</b> The BC agrees with only requiring a response from an applicant when a comment may impact scoring. We would also advise requiring confirmation and verification of the identity of the commenter. Identity of the commenter would not need to be disclosed to the public but anonymous or false identity used in submitting comments would appear to be another way to "game the system" and could financially impact an applicant unfairly.</p> <p>A longer comment period for community applications makes sense to allow for the communities impacted to become aware of the application and provide comments if appropriate</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html</a>)</p>	BC	<p>Agreement (Supports requiring response when comment may impact scoring) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
9	<p><b>Supports intent of recommendation and encourages more details to be added:</b> The BRG supports the intent of this preliminary recommendation, which is to improve predictability. However, more detailed information and definitions are required in terms of the types of comments, how they would be interpreted by the evaluators and their impact on the application scoring is needed to fully assess the impact of this proposal. We would not support a recommendation that leaves ICANN discretion to define new actions to be taken against applications on the basis of public comments as part of the implementation process.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html</a>)</p>	BRG	<p>Agreement (Supports the recommendations) Concerns (needs more details) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
10	<p><b>Supports recommendation with qualifications:</b> The RySG supports the intent of this preliminary recommendation, which aims to improve predictability. However, more detailed information and definitions are required in terms of the types of comments, how they would be interpreted by the evaluators and their impact on the application scoring is needed to fully assess the impact of this proposal. We would not support a recommendation that leaves ICANN discretion to define new actions to be taken against applications on the basis of public comments as part of the implementation process.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html</a>)</p>	RySG	<p>Agreement (Supports the recommendations) Concerns (need more details) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p><b>2.3.e.1: The Working Group has noted that while there was a cutoff for application comments to be considered by evaluators, the cutoff for Community Priority Evaluation was far later in the process, allowing for a much longer period of time for comments to be received for this evaluation element. The longer period of time allowed was due to the timing of CPE (i.e., only after program elements like Initial Evaluation, Extended Evaluation, and objections conclude). Is this, or other factors, valid reasoning and/or fair to have the comment period for CPE extend longer than for Initial Evaluation? Do you believe it makes sense to shorten this particular application comment period, perhaps just having it run in parallel to the Initial Evaluation comment period?</b></p>				
1	<p><b>Agrees with change:</b> The ALAC agrees that it was unfair for applications undergoing Community Priority Evaluation (CPE) to be subjected to a longer comment period than for Initial Evaluation and therefore thinks it is sensible to limit the comment period for CPE to run parallel to the Initial Evaluation comment period.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Supports the recommendations) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
2	<p><b>Supports 2.3.c.1 and 2.3.c.2: Supportive of 2.3.e.1 and 2.3.e.3:</b> The ALAC supports the WG's preliminary recommendations 2.3.c.1 to optimize the mechanisms and system for Application Comment and 2.3.c.2 for ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized.</p> <p><b>In pursuit of fairness, we are supportive of the idea of limiting the comment period for CPE to run parallel to the Initial Evaluation comment period.</b> We also think it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (support for limiting the comment period for CPE) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments
3	<p><b>Supports equal public comment period. Supports public comment extensions for change requests:</b> We support a clearly defined comment period for all types of applications. Comment periods for all types of applications should be the same time period and run concurrently. Comment periods should only be 'extended' where there is some subsequent change to an application (see 2.4 below). It seems reasonable that where there is an 'extension' comment period as a result of a change, then this should run for the same length of time as the initial comment period to ensure that third parties have adequate notice and opportunity to comment.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html</a>)</p>	IPC	<p>Agreement (with qualifications - same comment period for all types of applications) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	

<p><b>Support for a consistent and equal length of time for public comments that open and conclude at the same time, applicable to all applications and application types:</b> We fully support public comment on all applications, but subsequent procedures must ensure fairness and equity among all application types when accepting and considering public comments. There was not equity or fairness in the 2012 round.</p> <p>We believe there should be a consistent and equal length of time for public comments that open and conclude at the same time, applicable to all applications and application types. The public comment period should in no way, or for any reason, extend beyond the point when the first application in a subsequent procedure has completed Initial Evaluation. This ensures that all applications receive equal time for public comment, without disadvantaging or further scrutinizing any particular application or application type simply because of when their Initial Evaluation is scheduled or because they are required to participate in additional evaluations within the new gTLD program. This can be accomplished by simply disabling the public comment website so that no further submissions are accepted.</p> <p>We further believe that "letters of opposition" should be considered a form of public comment and should adhere to the same submission deadlines. It is unclear why in the 2012 round ICANN allowed community organizations additional time to register their comments (in this case opposition) against Community Applications, even accepting such comments years after the public comment period was closed. This has merely introduced a new gaming opportunity for competitive interests to pursue late in the application review process, providing them additional time to isolate and influence a community organization(s) against a Community Application.</p> <p>If community opposition exists against a Community Application, and the opposition does not intend to participate in a Community Objection, then it should be required that the expressed opposition be registered during the public comment period in the form of a letter of opposition. This will add to the transparency and legitimacy of the opposition going into Community Priority Evaluations, and lessen the ability and impact of gaming from competitive interests.</p>	<p>dotgay LLC</p>	<p>Agreement (qualified -- equal length of time for all public comments) New Idea (letters of opposition as public comments) WG Response:  Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p>4 (<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html</a>)</p>			
<p><b>Does not support changes to the extended comment period for community applications:</b> In view of the different treatment of community applications to standard applications, which included the evaluation of the level of support or opposition to community applications, the BRG does not recommend any changes to the extended comment period for these applications.</p>	<p>BRG</p>	<p>Divergence (opposes changes to extended comment period) WG Response:  Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p>5 (<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html</a>)</p>			
<p><b>Does not support changes to the extended comment period for these applications:</b> In view of the different treatment of community applications to standard applications, which included the evaluation of the level of support or opposition to community applications, the RySG does not recommend any changes to the extended comment period for these applications.</p>	<p>RySG</p>	<p>Divergence (opposes changes to the extended comment period) WG Response:  Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p>6 (<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html</a>)</p>			
<p><b>Does not support shortening the period:</b> With regards to the Community Priority Evaluation (question 2.3.e.1), the NCSG finds that CPE is a useful evaluation mechanism and we do not support the idea of shortening its period. Ideally, the time frame would be long enough to allow non-commercial organisations to make their observations and, thereby, broadening the pool of commercial interest inputs.</p>	<p>NCSG</p>	<p>Divergence (opposes changes to the extended comment period) WG Response:  Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
<p>7 (<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html</a>)</p>			
<p><b>Supports only requiring response when comment may impact scoring. Supports requiring verification of commenter. Believes longer comment period for community applications makes sense:</b> The BC agrees with only requiring a response from an applicant when a comment may impact scoring. We would also advise requiring confirmation and verification of the identity of the commenter. Identity of the commenter would not need to be disclosed to the public but anonymous or false identity used in submitting comments would appear to be another way to "game the system" and could financially impact an applicant unfairly.</p> <p>A longer comment period for community applications makes sense to allow for the communities impacted to become aware of the application and provide comments if appropriate</p>	<p>BC</p>	<p>Divergence (opposes changes to the extended comment period) WG Response:  Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	<p>Copied from General Comments</p>
<p>8 (<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000007.html</a>)</p>			
<p><b>2.3.e.2: In the 2012 round, applicants were given the opportunity through Clarifying Questions to respond to comments that might impact scoring. From one perspective, this may have reduced the incentive for applicants to respond to all input received through the public forum, including comments that may be perceived as negative. Do you consider this an issue that needs to be addressed? If so, what measures do you propose in response to this problem?</b></p>			

1	<p><b>Supports applicants having the option of responding to comments and provides additional guidance related to implementation of Application Comment:</b> The BRG believes the applicant should continue to have the option to respond to public comments available, where the applicant feels appropriate to do so. However, to minimise frivolous comments and false assertions, the source of the comments should be obtained and verified before publishing. <b>For comments that may have a material impact on application scoring, we believe it is appropriate to continue to allow both general responses through the public forum and directly to ICANN through the designated application response period. In some cases, applicants may have information that is pertinent to assessing the relevance of a comment that they do not wish to share publicly through the public comment forum.</b> Applicants should have mechanisms at their disposal for providing both public and not public information that is responsive to comments received.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html</a>)</p>	BRG	<p>Agreement (supports the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
2	<p><b>Supports allowing applicants to respond:</b> We support providing an opportunity for applicants to respond to comments. We recommend that after a public comment period, the applicants are given a separate window to respond to public comments (see 2.3.e.3).</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html</a>)</p>	IPC	<p>Agreement (support for applicant to respond) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
3	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. <b>Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</b></p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG	<p>Agreement (support for applicant to respond) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
4	<p><b>Supports allowing applicants to respond with qualifications:</b> The RySG believes the applicant should continue to have the option to respond to public comments available, where the applicant feels appropriate to do so. However, to minimise frivolous comments and false assertions, the source of the comments should be obtained and verified before publishing. For comments that may have a material impact on application scoring, we believe it is appropriate to continue to allow both general responses through the public forum and directly to ICANN through the designated application response period. In some cases, applicants may have information that is pertinent to assessing the relevance of a comment that they do not wish to share publicly through the public comment forum. Applicants should have mechanisms at their disposal for providing both public and not public information that is responsive to comments received.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html</a>)</p>	RySG	<p>Agreement (but with verification) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
5	<p><b>Believes that if applicants are given a period to respond, commenters should be given a response period as well: The NCSG believes that if applicants are allowed to respond to comment, commenters should be allowed another round of comments (question 2.3.e.2).</b> As noted in the Deliberation, some comments are frivolous, but others are quite serious. They are raising key comments and concerns from the public and those impacted by the nature of the gTLD (open, restricted, etc). "Clarifying Questions" may or may not be sufficient to address concerns of a public seeking to understand what lawyers are including in a gTLD application. <b>If the applicant responds, the public must be allowed to respond as well.</b> Otherwise, false, misleading, or incorrect information may be provided by an applicant in response to legitimate concerns and questions raised by commenters.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html</a>)</p>	NCSG	<p>Agreement (but public must be allowed to respond to commenters responses) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
6	<p><b>Disagrees with the point that applicants were given the chance to respond to comments that might impact scoring; suggests that letters of opposition are a form of public comment and that there should be clear parameters for accepting public comment:</b> We disagree with the assertion that applicants were given the chance to respond to comments that might impact scoring, especially in Community Priority Evaluations. In our experience, no Clarifying Questions were issued despite a point in Criteria #4 being withheld because of a single letter of opposition, which we categorically believe fits the definition of a public comment and was logged in the public forum years after the public comment period had technically closed.</p> <p>We believe that without concluding that letters of opposition are a form of public comment, and without setting clear parameters for accepting public comment, it will be impossible for evaluators to understand their requirement to issue Clarifying Questions when scoring could be impacted in CPE. <b>Letters of opposition must be included in the definition of public comments, and they must follow all applicable rules and submission deadlines for public comments as we have previously stated in 2.3.e.1 above.</b></p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html</a>)</p>	dotgay LLC	<p>Divergence (disagrees with the premise of the question) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>
7	<p><b>Does not believe necessary:</b> The ALAC does not consider this an issue that needs to be addressed because we understand that applicants are free to determine for themselves whether to respond any comment and to judge the consequences of a response or non-response.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Divergence (disagrees that this is an issue to be addressed) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>

2.3.e.3: If there is a application comment period prior to evaluations, should applicants be given a certain amount of time to respond to the public comments prior to the consideration of those comments. For example, if there is a 60-day public comment period, should an additional time period of 7-10 days be added solely for the purpose of providing an opportunity for applicants to respond to the comments if they so choose?				
1	<p><b>Potential support for this suggestion, depending on details of program implementation:</b> We could support this suggestion. I think that many applicants believed some public comments didn't warrant or require a dignified response due to the inaccuracy, irrelevance or misguided nature of the comment, believing that due diligence on behalf of the evaluator would sort through the facts and mistruths. If the standard going forward is that due diligence by the evaluator(s) is not to be assumed, and that it is the applicants responsibility (not the evaluators) to clarify or defend even the most frivolous and/or outrageous of comments to avoid evaluator(s) shortcoming, then the additional time will be necessary for applicants to submit formal responses.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000001.html</a>)</p>	dotgay LLC	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
2	<p><b>Support for this suggestion:</b> The BRG believes this is a sensible enhancement, providing the applicant with an opportunity to reply to comments, especially those received at the end of the comment period.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000005.html</a>)</p>	BRG	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
3	<p><b>Supports modified version - allow for response for comments submitted 7 days or less before close of 60-day period:</b> The ALAC thinks it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose. In other words, the additional 7 days is meant to allow applicants reasonable time to respond to comments that are submitted 7 days or less before the close of a 60-day public comment period.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
4	<p><b>Supports 2.3.c.1 and 2.3.c.2: Supportive of 2.3.e.1 and 2.3.e.3:</b> The ALAC supports the WG's preliminary recommendations 2.3.c.1 to optimize the mechanisms and system for Application Comment and 2.3.c.2 for ICANN to be more explicit in the Applicant Guidebook on how public comments are to be utilized.</p> <p>In pursuit of fairness, we are supportive of the idea of limiting the comment period for CPE to run parallel to the Initial Evaluation comment period. We also think it is appropriate to allow applicants an additional but limited period of 7 days after the close of a 60-day public comment period strictly to enable applicants to respond to late comments if they so choose.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000006.html</a>)</p>	ALAC	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	Copied from General Comments
5	<p><b>Supports applicants being granted response period:</b> We support an additional period at the conclusion of the public comment period for applicants to respond to the comments if they wish. This provides applicants with an opportunity to respond to all comments received and mitigates the risk of negative comments being submitted last minute to prevent the applicant from responding.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000011.html</a>)</p>	IPC	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
6	<p><b>Supports the enhancement:</b> Yes, the RySG believes this is a sensible enhancement, providing the applicant with an opportunity to reply to comments, especially those received at the end of the comment period.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000008.html</a>)</p>	RySG	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
7	<p><b>Supports period, no longer than 10 days, for applicants to respond. Period should be a part of the overall public comment period. Public response period needed as well:</b> Wrapping up the 'Role of Application' section of the supplemental report, question 2.3.e.3 comments on the possibilities of (a) allowing an application comment period prior to evaluations, and (b) Applicants be given a certain amount of time to respond to the public comments prior to the consideration of those comments. The NCSG agrees that applicants should be given a short period of time to respond to comments. On the length and purpose of the period, we would like to note that applicants should indeed respond to more relevant comments and be allowed to include attachments. Additionally, this timeframe for applicant response should not be longer than 10 days - to be included in the public comment period. Last but not least, the broader community should be allowed to respond, critique and comment on the applicant's response. It is very important to have this public response period, following applicant's and something past experience shows it is critical for the future applicant guidebook to include.</p> <p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000013.html</a>)</p>	NCSG	<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	



	<p><b>Commenter should be verified and applicant should be allowed to respond:</b> The key here is transparency. If a comment is going to be made public, then there needs to be transparency in who is commenting, and ICANN must verify the identity of commenters. Anonymous comments or comments where ICANN is unable to identify the commenter should not be permitted/posted. <b>Furthermore, once a comment is received, the Applicant should be permitted to address/rebut all comments.</b></p>		<p>Agreement (Support for the recommendation) WG Response:</p> <p>Action Taken: [COMPLETED / NOT COMPLETED] - [Instruction of what was done.]</p>	
8	<p>(<a href="https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html">https://mm.icann.org/pipermail/comments-new-gtld-subsequent-procedures-supp-initial-30oct18/2018q4/000010.html</a>)</p>	RrSG		Copied from General Comments