Appendix C:

ICANN At-Large Scorecard on Subsequent Procedures PDP

At-Large Small Team on Subsequent Procedures

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Introduction to Scorecard

This Appendix C: ICANN AT-LARGE SCORECARD ON SUBSEQUENT PROCEDURES POLICY DEVELOPMENT PROCESS is an appendix to the AT-LARGE WHITEPAPER ON SUBSEQUENT PROCEDURES dated 13 February 2020 ("the Whitepaper").

Purpose of Scorecard

This Scorecard contains the At-Large Community's assessment of topics or areas of policy development undertaken by the GNSO-initiated New gTLD Subsequent Procedures Policy Development Process Work Group ("SubPro PDP WG") since February 2016 and up to Q1, 2020.

In particular, it sets out At-Large's positions on expected draft recommendations relating to policy areas which the SubPro PDP WG is working on and which we believe affect the interests of Internet end-users.

Sources of Reference

This Scorecard has been developed with reference to SubPro PDP WG's deliberations of inputs from sources available to it, including but not limited to:

1. Comments to preliminary recommendations and/or questions presented in:
    a. Initial Report on the New gTLD Subsequent Procedures PDP (Overarching Issues & Work Tracks 1-4) dated 3 July 2018 [https://www.icann.org/public-comments/gtld-subsequent-procedures-initial-2018-07-03-en]
    b. Supplemental Initial Report on the New gTLD Subsequent Procedures PDP (Overarching Issues & Work Tracks 1-4) dated 30 October 2018 [https://www.icann.org/public-comments/new-gtld-subsequent-procedures-supp-initial-2018-10-30-en]
    c. Work Track 5 on Geographic Names at the Top Level - Supplemental Initial Report of the New gTLD Subsequent Procedures PDP dated 5 December 2018 [https://www.icann.org/public-comments/geo-names-wt5-initial-2018-12-05-en]
2. Prerequisite and High Priority Level Recommendations relevant to SubPro PDP WG's work (i.e. Annexure A to the Whitepaper)[1] contained in the Competition, Consumer Choice and Consumer Trust Review Final Report dated 8 September 2018 [https://www.icann.org/en/system/files/files/cct-final-08sep18-en.pdf]
3. ICANN Board Action on Final CCT Recommendations dated 1 March 2019 [https://www.icann.org/en/system/files/files/resolutions-final-cct-recs-scorecard-01mar19-en.pdf]
4. Work Track 5 Final Report to the SubPro PDP WG dated 22 October 2019[2]
5. SubPro PDP WG Summary Working Documents 2019 [https://community.icann.org/display/NGSPP/Summary+Working+Documents]

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[1] [https://community.icann.org/download/attachments/111390697/Annexure%20A%20-%20CCTRT%20Prerequisite%20and%20High%20Priority%20Level%20Recommendations.pdf?version=1&modificationDate=1565047487000&api=v2]

[2][https://community.icann.org/download/attachments/111390697/Work%20Track%205%20Final%20Report%20to%20the%20New%20gTLD%20SubPro%20PDP%20WG%20-%2022%20October%202019%5B1%5D.pdf?version=1&modificationDate=1576497110000&api=v2]

At-Large Areas of Concern

The full list of SubPro areas or topics, with corresponding concern levels to At-Large, is as follows:

PRIORITY	SUBSEQUENT PROCEDURES AREAS / TOPICS	Sub-Areas / Related Areas
	CROSS-CUTTING ISSUES	
High	1. DNS Abuse Mitigation	• Contractual Compliance • Base Registry Agreement
High	2. CCT Recommendations Prerequisite and High Priority Level Recommendations relevant to SubPro PDP WG's remit contained in the Competition, Consumer Choice and Consumer Trust Review Final Report of 8 September 2018	• Consumer Trust • DNS Abuse
TBD	3. Geographic Names at the Top Level [WT5]	• Definition of geographic names, geographic indicators etc • Geographic Names Panel • Preventative versus Curative protections • Translations • Non-AGB Terms
	OVERARCHING ISSUES	
High	4. Cost vs Benefit of New gTLD Program – Continuing Subsequent Procedures [2.2.1]	• Metrics
Medium	5. Predictability [2.2.2] / Clarity of Application Process [2.2.2.2]	• **Predictability Framework [NEW]** ➤ **Standing Predictability Implementation Review Team (SPIRT)**
Medium	6. Application Assessed in Rounds [2.2.3]	• Different TLD Types [2.2.4] • Feedback to Neustar's proposal for a 3-phased application model
Medium	7. Different Types of TLDs [2.2.4]	• Community Applications [2.9.1] • Feedback to Neustar's proposal for a 3-phased application model
Low	8. Applications Submission Limits [2.2.5]	•
Low	9. Accreditation Programs [2.2.6]	• Applicant Support Program [2.5.4]
	FOUNDATIONAL ISSUES	
High	10. Public Interest Commitments & Other Safeguards [Global Public Interest, 2.3.2]	• Mandatory PICs • Voluntary PICs – Systems [2.4.3] • Verified TLDs
Low	11. Applicant Freedom of Expression [2.3.3]	•
High	12. Universal Acceptance (UA) [2.3.4]	• Systems [2.4.3]
	PRE-LAUNCH ACTIVITIES	
Low	13. Applicant Guidebook [2.4.1]	• Translations, timing of release vs program communication/outreach

PRIORITY	SUBSEQUENT PROCEDURES AREAS / TOPICS	Sub-Areas / Related Areas
Low	14. Communications [2.4.2]	• Outreach to Middle/Global South candidates – Applicant Support Program [2.5.4]
Low	15. Systems [2.4.3]	• Implementation of PICs submission – Global Public Interest [2.3.2]
	APPLICATION SUBMISSION	
High	16. Applicant Support Program (ASP) [2.5.4]	• Funding source • Outreach – Communication [2.4.2] • Criteria – Metrics • Accreditation Programs [2.2.6] • Application Fees [2.5.1] • Appeals – Accountability Mechanism [2.8.2]
Medium	17. Application Fees [2.5.1] 18. Variable Fees [2.5.2]	• Cost Recovery Principle • Applicant Support Program [2.5.4]
Low	19. Application Submission Period [2.5.3]	•
Low	20. Terms & Conditions [2.5.5]	• Accountability Mechanism [2.8.2] • Name Collisions [2.7.8]
	APPLICATION PROCESSING	
Medium	21. Applicant Change Requests [S2.4]	•
Low	22. Application Queueing [2.6.1]	•
	APPLICATION EVALUATION/CRITERIA	
High	23. Reserved Names [2.7.1]	•
High	24. Closed Generics [2.7.3]	• Generic terms as TLDs • Single registrant / Brand TLDs
High	25. String Similarity [2.7.4]	• String Similarity Review • String Confusion Objection (under Objection [2.8.1] • Accountability Mechanism [2.8.2]
High	26. Internationalized Domain Names (IDN) [2.7.5]	• IDN Variant TLD Implementation • RZ-LGRs • Risk of DNS Abuse, end-user confusion
High	27. Security and Stability [2.7.6]	• Delegation Rates • Banning of emojis as TLDs • DNS Abuse mitigation • Algorithmic checking - Systems [2.4.3]
High	28. Name Collisions [2.7.8]	• NCAP Study 1 (Studies 2 and 3?)
Medium	29. Registrant Protections [2.7.2]	• EBERO, COI • Applicant background screening
Low	30. Applicant Reviews: Technical/ Operational, Financial and Registry Services [2.7.7]	•

PRIORITY	SUBSEQUENT PROCEDURES AREAS / TOPICS	Sub-Areas / Related Areas
Medium	31. Role of Application Comment [S2.3]	•
	DISPUTE PROCEEDINGS	
High	32. Objections [2.8.1]	• Community Objections • Public Interest Objections • Independent Objector
High	33. Accountability Mechanism [2.8.2]	• **Accountability Framework [NEW]** ➢ **Appeals against objection/ evaluation determinations**
	STRING CONTENTION RESOLUTION	
High	34. Community Applications [2.9.1]	• Community Priority Evaluation (CPE) • Community Objections distinct from CPE – Objections [2.8.1] • Appeals – Accountability Mechanism [2.8.2] • Application Assessed in Rounds [2.2.3] (including Neustar's proposal)

High	35. Auctions as Mechanism of Last Resort, Private Resolution of Contention Sets (incl. Private Auctions) [S2.1, S2.2]	• **String Contention Mechanism of Last Resort [NEW]**
		  ➢ **Private resolution**
		  ➢ **Sealed bid auction**

	CONTRACTING	
High	36. Base Registry Agreement [2.10.1]	• DNS Abuse mitigation
None	37. Registrar Non-Discrimination / Registry / Registrar Standardization [2.10.2]	•
None	38. Registrar Support for New gTLDs [2.5]	•
	PRE-DELEGATION	
None	39. Registry System Testing [2.11.1]	•
	POST-DELEGATION	
None	40. TLD Rollout [2.12.1]	•
TBD	41. Second Level Rights Protection Mechanisms [2.12.2]	•
High	42. Contractual Compliance [2.12.3]	• DNS Abuse mitigation

Status of Scorecard

This Scorecard is updated from time to time, as and when new information becomes available.

FOUNDATIONAL ISSUES

Topic/Area:	**[10] PUBLIC INTEREST COMMITMENTS (PICs) & OTHER SAFEGUARDS**	Priority:	**HIGH**	Settled On:	

Related:	• **DNS Abuse, Contractual Compliance** • **GAC Advice/GAC Early Warnings, Safeguards - Verified TLDs** • *Systems [2.4.3] – Submission of PICs during application process*
Key Issues:	How to best handle PICs (mandatory vs voluntary) and other safeguards eg GAC EWs, Verified TLDs, given the experiences and whatever data has been available from 2012 round?
Policy Goals:	• Develop policy consistent with ICANN's Core Values under Article 1 Section 1.2(b)(ii)[3] • To the extent that mandatory and/or voluntary PICs are carried forward into SubPro, they should be codified in policy
Assigned CCT-RT Rec's:	? Rec. 12: Meeting user expectations on SL domain use, registrations for sensitive/regulated industries; safety & security of user personal & sensitive info (prerequisite for SubPro) ? Rec. 15: Amendments to RAA & RA to prevent systemic DNS security abuse (prerequisite for SubPro) ? Rec. 14: Pro-active anti-abuse measures (high priority for SubPro) ? Rec. 16: Support ongoing data collection efforts (eg DAAR) (high priority for SubPro) ? Rec. 23: Gather data on new gTLDs operating in highly-regulated sectors to include 5 elements (high priority for SubPro & ICANN Org) ✓ Rec. 25: Voluntary commitments must include intended goal, allow sufficient opportunity for community review, Limited Public Interest objection deadlines; organized, searchable (high priority for SubPro & ICANN Org)
References:	• SubPro WG Foundational Issues_Summary Document, 7 January 2020 • [01. SubPro Global Public Interest Update to CPWG, 13 July 2019](#)

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
1. **Mandatory PICs** Should codify current implementation of mandatory PICs as policy	Codification of current implementation of mandatory PICs as policy recommendations, no additional mandatory PICs needed	Yes, ALAC supported this.	Revisit with GAC to ensure mandatory PICs reflect discussions between GAC Public Safety WG and Registries as appropriate

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[3] See: https://www.icann.org/resources/pages/governance/bylaws-en/#article1

recommendations, no additional mandatory PICs needed.			
2. Voluntary PICs a) Should continue <u>voluntary PICs</u>, allow applicants to commit to additional voluntary PICs in response to public comments, GAC EW and/or GAC Advice, even if changes nature of original application	In conjunction with CCT Rec. 25, Voluntary commitments must include intended goal, allow sufficient opportunity for community review, Limited Public Interest objection deadlines; organized, searchable (high priority for SubPro & ICANN Org)	Yes, ALAC supported this as voluntary PICs have been proven instrument in ensuring responsible operation of <u>some</u> TLDs.	Should there be limits to individual applicant voluntary PICs? Eg where voluntary PICs: (i) touches on areas outside of ICANN's remit or (ii) goes beyond consensus policy or (iii) offers rights protection beyond PDDRP, RRDRP, URS or (iv) declines to offer proxy & privacy services.
b) Have applicant to spell out voluntary PICs – limitation in time, duration, scope to be reviewable by ICANN, objector or GAC (what the case may be) **for all types of applications**.	<u>SubPro PDP WG reaction</u> *"If the WG supports the CCT-RT recommendation, the WG may want to further discuss whether preliminary recommendations should affirm the recommendation that PICs should state their intended goal. The WG may also want to discuss whether SubPro recommendations should more explicitly align with language: "[PICs must] be submitted during the*	Yes, ALAC supported this. No reason to not apply to all types of applications.	
c) Voluntary PICs should be in RA, with change allowed only after public comment where change addresses objection/comment per objector, GAC EW/Advice.	*application process such that there is sufficient opportunity for community review and time to meet*	Yes, ALAC supported this.	
d) Agreement that voluntary PICs are an appropriate way to address issues from GAC EW, public comments etc	*the deadlines for community and limited public interest objections." The WG may also want to consider if any additional recommendations are needed regarding publication*		

	and accessibility of voluntary PICs. The WG may want to consider if preliminary recommendation 2.3.2.c.4 on modification of PICs is consistent with this CCT-RT recommendation."		
e) Providing single-registrant TLDs with exemptions and/or waivers to mandatory PICs in Spec 11 3(a) and 11 3(b).			*Clarify: Support exemptions/waivers only if alternative, equally rigorous ways to achieve commitments*
f) <mark>Submission of Voluntary PICs</mark>	A way for application system to enable applicants to submit PICs		Follow through under "Systems" and monitor in implementation.
3. Verified TLDs – no high-level agreement	Unsure	CCTRT Final Report states that there are difficulties with assessing effectiveness of new gTLD consumer safeguards, particularly PICs, due to lack of reporting framework and associated data.	<mark>KIV need to follow up</mark> by way of Advice to Board, in discussion with GAC <mark>– There is need for restrictions on registrants and use of DN to improve public trust in new gTLDs; use panel skilled in consumer trust, identify/study options to establish recommendations for reporting/data</mark>
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
4.			

PENDING ISSUES:	SubPro PDP WG reaction	What else needs to be done and by/with whom?
5. CCT Rec. 12 Meeting user expectations on SL domain use, registrations for sensitive/regulated industries; safety & security of user personal & sensitive info (prerequisite for SubPro)	*"The SubPro PDP has not thoroughly considered the findings from the Nielsen surveys, which at a high level indicated that, "the public believes that websites have different extensions to "properly identify the purpose or owner or to give an indication of content or function." As such, the PDP WG has also not considered whether it believes that creating incentives or removing potential barriers (e.g., application fee, annual fees, possible need for RSEP) to operating restricted TLDs is in the best interest of the program."* SUBPRO WG EXPECTED TO REVISIT	Thoughts?
6. **CCT Rec. 14** Pro-active anti-abuse measures (high priority for SubPro)	*"The PDP WG has not looked specifically at introducing financial incentives for registries to adopt proactive anti-abuse measures, but it has considered the prevention of abuse in the context of section 2.3.2 of its Initial Report on the Global Public Interest. There, the PDP WG has preliminarily recommended maintaining the mandatory Public Interest Commitment (PIC) framework, as well as refining the process, scope, and applicability of voluntary PICs.* *The SubPro PDP may want to specifically consider whether it supports including, ""provisions in the agreements to provide incentives, including financial incentives, for registries, especially open registries, to adopt proactive anti-abuse measures."" The PDP WG may want to review the DNS Abuse Review performed on behalf of the CCT-RT.* *If the PDP WG were to recommend financial incentives, the WG may want to consider the financial impact of doing so and whether it is within the remit of the PDP WG to make such recommendations.* *Note: The WG has also addressed the topic of DNS Abuse as being a community wide discussion instead of one specifically geared at only the new gTLDs."* SUBPRO WG EXPECTED TO REVISIT	Related to DNS Abuse Revisit whether sufficiently addressed in recent ALAC Advise to Board on DNS Abuse of 26 Dec 2019.
7. CCT Rec. 15	*"This recommendation appears to target existing registry operators and registrars, whereas recommendation 14 also seeks to amend the base registry agreement for future new gTLD procedures. The PDP WG should consider whether they believe recommendation 15 is relevant to its work. This*	Related to DNS Abuse

Amendments to RAA & RA to prevent systemic DNS security abuse (prerequisite for SubPro)	*recommendation may be most appropriately addressed by registries/registrars and ICANN org, utilizing the prescribed contract negotiation processes.”* *SUBPRO WG EXPECTED TO REVISIT*	Revisit whether sufficiently addressed in recent ALAC Advise to Board on DNS Abuse of 26 Dec 2019.
8. CCT Rec. 16 Support ongoing data collection efforts (eg DAAR) (high priority for SubPro)	*“This recommendation appears to primarily focus on continuing to commission studies around specific registry operators, registrars, and technical DNS abuse. If the PDP WG is in agreement that this exercise should take place, could develop similar recommendation(s).* *In connection to recommendation 14, the PDP WG may want to consider data collected by the CCT-RT related to this subject to determine if any additional measures, including financial incentives, should be recommended."* *SUBPRO WG EXPECTED TO REVISIT*	Related to DNS Abuse Revisit whether sufficiently addressed in recent ALAC Advise to Board on DNS Abuse of 26 Dec 2019.
9. CCT Rec. 23 Gather data on new gTLDs operating in highly-regulated sectors to include 5 elements (high priority for SubPro & ICANN Org)	*“The recommendation is primarily focused on additional data gathering in the future and if the PDP WG is in agreement that this exercise should take place, could develop similar recommendation(s).* *To the extent that the CCT-RT has already collected data related to areas identified in the recommendation, the PDP WG could consider whether those findings might impact ongoing policy development work.* *Note: This seems to be more of a compliance activity as opposed to one that will aid in moving forward. The issue we need to decide is whether to maintain the PICs that ICANN has included for future ""sensitive"" strings.* *[Could provide guidance without being definitive. Could ask applicants to self-identify. If there is a panel involved, the more important that there be criteria developed.]"* *SUBPRO WG EXPECTED TO REVISIT*	Related to DNS Abuse Revisit whether sufficiently addressed in recent ALAC Advise to Board on DNS Abuse of 26 Dec 2019.
Position:		

FOUNDATIONAL ISSUES

Topic/Area:	[12] UNIVERSAL ACCEPTANCE (UA)		Priority:	HIGH	Settled On:	

Related:	• Internationalized Domain Names (IDNs) [2.7.5] • Systems [2.4.3] • Universal Acceptance Initiative and UASG
Key Issues:	How to: (1) improve promotion of UA by the ICANN Community and (2) advocate for wider adoption of UA in the Internet community
Policy Goals:	• Awareness of issues related to Universal Acceptance should be increased • Initiatives related to Universal Acceptance should be supported and promoted, as appropriate
Assigned CCT-RT Rec's:	None
References:	• SubPro PDP WG Foundational Issues_Summary Document, 7 January 2020 • Working Document_SubPro Draft Final Recommendations, 16 February 2020

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
10. Support for UA initiative	<u>Affirmation</u>: WG welcomes and encourages the work of the UA Initiative and the UASG.	Yes.	
	<u>Affirmation</u>, per 2012 round: WG affirms 2012 implementation elements addressing UA issues, and in particular, guidance per s.1.2.4 AGB ("Notice concerning Technical Acceptance Issues with New		

	gTLDs"), as well as cl. 1.2 of the RA ("Technical Feasibility of String").		
11. Support for amending Principle B: *"Some new gTLDs should be IDNs subject to the approval of IDNs being available in the root."* [4]	<u>Recommendation</u>: WG recommends revising Principle B to read *"Some new gTLDs should be IDNs. Applicants should be made aware of UA challenges in ASCII and IDN TLDs. They should be given access to all applicable information about UA currently maintained on ICANN's Universal Acceptance Initiative page, through the UASG, as well as future efforts."* <u>Implementation Guidance</u>: ICANN should include more detailed info re UA issues either directly in the AGB or by reference to the AGB to additional resources produced by the UASG or other related efforts.	Yes, with suggested amendment that applicants MUST (instead of "should") be given access to all applicable information about UA etc.	
What has SubPro PDP WG concluded?	**<u>What SubPro PDP WG will likely omit?</u>**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
12. <u>Some</u> say no additional work should be proposed beyond that being done by the UA Initiative and UASG.	<u>There is some pushback on this via PC feeback.</u> For eg. BC and ALAC have indicated ways for pushing the UA agenda further.	The conclusion is strongly supported. Contrastingly, it would be beneficial to have a clear recommendation for UA.	Could be further input to SubPro WG and/or Advice to Board to cover/include: • In addition to supporting and encouraging the work of the UASG, ICANN should invest in being itself able and ready to

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[4] GNSO's Final Report on the Introduction of New Generic Top-Level Domains

			communicate to registrants and end-users in languages/scripts for LGRs have been released under the IDN Variant TLD Implementation • ICANN should strongly encourage Registries and Registrars which are owned by the same entity to be UA ready in any new gTLD applications. Rationale being it is easier for such entities to ensure cross-entity systems are ready IDN registrations, ready to handle IDN and non-IDN New gTLDs consistently on nameservers, and to manage EAI (i.e. \<nativelanguage>@\<idn>.\<idn> as part of the contact information and be able to send and receive emails of these type of addresses; and be able to take affirmative action to ensure their suppliers are also UA ready • What else?
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
13.			
Position:			

APPLICATION SUBMISSION

Topic/Area:	**[16] APPLICANT SUPPORT PROGRAM (ASP)**	Priority:	**HIGH**	Settled On:	

Related:	• **Global South/Middle Applicant outreach – *Communication [2.4.2]*** • **Nature of support – use of funds, beyond funds, funding source** • **Criteria – Metrics** • Accountability Mechanism – appeal against SARP evaluation determination • Contention set resolution involving ASP Applicants • Support – Accreditation Programs [2.2.6] • Application Fees [2.5.1] & Variable Fees [2.5.2]
Key Issues:	The ASP for the 2012 application round offered USD2mil in financial support but yielded only 3 ASP applicants. None of the 3 ASP applicants were found to have met the selection criteria, and as a result their applications were terminated. In hindsight, the selection criteria standard was said to have been set too high, driven primarily by overwhelming caution against risk of 'gaming'. Three other issues which arise are to do with: • Metrics for measuring success of ASP Program; • *Appeals process to SARP determinations (which did not exist before); and* • *If successful ASP applicants should receive priority in contention sets (and under what circumstances)*
Policy Goals:	• Increase "success" of program, using a set of metrics – awareness/outreach, total EOIs, total applicants, total ASP "grantees" etc • Provide financial support and services to certain qualified applicants in order to serve the above goals. • Ensure that information about the program and participation in the program is accessible to the target audience.
Assigned CCT-RT Rec's:	✓ Rec. 32: Revisit the Applicant Financial Support Program (prerequisite for SubPro) ? Rec. 29: Set objectives/metrics for applications from the Global South (prerequisite for SubPro) ? Rec. 30: Expand and improve outreach into the Global South (prerequisite for ICANN Org) ✓ Rec. 31: ICANN Org to coordinate the pro bono assistance program (prerequisite for ICANN Org)
References:	• SubPro PDP WG Application Submission_Summary Document, 7 January 2020 • 02. SubPro Applicant Support Update to CPWG, 31 July 2019

What has SubPro PDP WG concluded?	What will/might SubPro PDP WG recommend?	Is this acceptable? If not, why so?	What else needs to be done & by/with whom?
14. No objection to ASP continuing, and should	The continuation of ASP in SubPro which will:		
a) Be open to applicants regardless of their location as long as they meet program criteria – ie eligibility	a) Be open to applicants regardless of their location as long as they meet program criteria	Yes	Advocate to SubPro for IRT to include requirement that applicant must demonstrate how they would serve target region or community
b) Target Global South & "Middle Applicant" (ie still struggling regions which may not be underserved or underdeveloped)	b) Target Global South & "Middle Applicant"	Yes	Work with ICANN Org on definition of "Global South", or agreement on how to describe underserved or underrepresented regions
c) Employ longer lead times to create awareness, draw on regional experts, leverage tools & expertise to evaluate applicant business cases	c) Employ longer lead times to create awareness, draw on regional experts, leverage tools & expertise to evaluate applicant business cases	Yes, outreach was very poor for 2012 round.	
d) Extend financial support beyond subsidy on application fees	d) Extend financial support towards expenses like application writing fees, related attorney fees, ICANN registry-level fees	Yes, this is useful and is in addition to pro bono assistance program per CCT-RT Rec. 31	
e) Consider number of successful applicants as a measure of success	e) Consider number of successful applicants as a measure of success	Yes, but this is only one possible measure.	
15. Policy changes needed to increase chances of ASP succeeding	Unclear	Yes, lends to CCT-RT Rec's. 32, 30	

16. No automatic termination of applications which do not meet ASP criteria	ASP applicants who fail to meet requirements to be given a choice to move to a standard application	Yes, we advocated strongly for this. Unsuccessful ASP applicants should be allowed to choose either withdraw or transfer to standard application regime, with reasonable time given to pay balance application fee amount if choose to transfer.	
17. SARP evaluations ought to be appealable	SARP evaluations to be part of new Accountability Framework	Yes	Monitor cost of filing, losing appeals
18. ASP vis a vis fees regime	Successful ASP candidates will be eligible for reduced application fee.	Yes	
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
19. No consensus for priority to successful ASP applicant in string contention	Priority for successful ASP applicant in string contention	Thoughts? • *Geoname string application from the same jurisdiction?*	
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
20. Metrics framework for measuring success			Yes, necessary; lends to CCT-RT Rec. 29; but what other metrics to apply? • Number of ASP applicants • Number of successful ASP applicants
21. Dealing with risk of gaming			Yes, necessary to inquire with SubPro WG after: • Expanding SARP's evaluation methodology to include determination of gaming

			• Broad agreement on penalty to be applied
22. Method for selecting recipients if applicants exceeds funds allocated			<mark>Quota for each region.</mark> <mark>Other thoughts?</mark>
23. Source of ASP funding			<mark>Thoughts? Other than partial excess of application fees.</mark>
Position:			

APPLICATION SUBMISSION

Topic/Area:	[17] APPLICATION FEES [2.5.1] [18] VARIABLE FEES [2.5.2]	Priority:	MEDIUM	Settled On:	

Related:	• Cost Recovery Principle • Applicant Support Program [2.5.4] • *Community Applications [2.9.1]??*

Key Issues:	• Do we keep to the Cost Recovery Principle (or "revenue neutral" principle) in setting application fees? • If "yes" to Cost Recovery, it is for ICANN Org / GDD to tabulate and present the cost of the 2012 Program; the difficulty is the 2012 Program hasn't concluded and there are still "costs" pending/budgeted for. However, what elements should be factored into "cost"? • Notwithstanding, should we stipulate an application fee floor which sufficiently mitigates risk of speculation, warehousing, "abuse" etc while still making it attractive to invest in running a new gTLD? • In such situation if we were to set a fee level based on best estimate, how should we deal with any excess collected or shortfall incurred in subsequent procedures? <u>For Next Round, possible scenarios</u> [1] Actual should-have-been application fee per "revenue neutral" principle Shortfall **Application fee floor** Buffer to deter speculation, warehousing, abuse etc? Excess [0] Estimated application fee per "revenue neutral" principle Estimated application fee [2] Actual should-have-been application fee per "revenue neutral" principle

Policy Goals:	The gTLD evaluation fee is set to **recover costs** associated with the new gTLD program. The fee is set to ensure that the program is **fully funded and revenue neutral and is not subsidized by existing contributions from ICANN funding sources, including generic TLD**

	registries and registrars, ccTLD contributions and RIR contributions; <u>subject to the use of a fee floor intended to deter undesired behaviours</u>
Assigned CCT-RT Rec's:	None
References:	• SubPro WG Application Submission_Summary Document, 7 January 2020 • SubPro WG Working Document_SubPro Draft Final Recommendations, 31 January 2020

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG affirm and/or recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
24. After considering various inputs regarding the question of single base fee, differing circumstances experienced from 2012 round, GAC Nairobi Communique (2010) etc – • no agreement to recommend charging different fees for different types of application • no agreement on feasible path for different fees • retain single base fee with additional fees where additional costs incurred to avoid excessive cross-subsidization • enhance Applicant Support Program in SubPro to better service ASP goal	<u>Affirmation</u>, per 2012 round, that: • All applications in subsequent procedures should pay the **same base application fee regardless of application type or number of applications submitted by same applicant**, not precluding additional fees as needed (ie. For Community Priority Evaluation, Registry Service Evaluation Process, etc); • **Successful Applicant Support Program candidates will be eligible for reduced application fee**.		

25. Support for overall funding approach in 2012 round – should be self-sustaining and operate on cost recovery basis with goal of being revenue neutral	Affirmation for: • Implementation Guidance B: "Application fees will be designed to ensure that adequate resources exist to cover the total cost to administer new gTLD process. Application fees may differ for applicants." • The gTLD evaluation fee is set to **recover costs** associated with the new gTLD program. The fee is set to ensure that the program is **fully funded and revenue neutral and is not subsidized by existing contributions from ICANN funding sources, including generic TLD registries and registrars, ccTLD contributions and RIR contributions;** <u>modified by Implementation Guidance (1)</u>		
26. Guidance on application fee vs application fee floor	<u>Implementation Guidance (1):</u> In event estimated application fee (based on revenue neutral principle) falls below predetermined threshold amount (ie application fee floor), actual application fee should be set at that higher application fee floor instead		

27. Excess fees collected should at least in part be returned to applicants – disbursement mechanism to be communicated in advance	Recommendation: In managing funds for New gTLD Program, ICANN should have a plan in place for managing any excess fees collected or budget shortfalls experienced. The plan for management and disbursement of excess fees (if any) should be communicated in advance of accepting applications and collecting fees; per Implementation Guidance (2) Implementation Guidance (2): • If excess fees collected and cost recovery model is followed (i.e. fee floor not used), then any excess should be returned to applicants where possible. Disbursement mechanism should be communicated before submission of applications and fees to ICANN		
28. In event of excess fees, excess should be used to benefit one or more of: (a) general outreach (b) long-term program need (c) Applicant Support Program (d) Top-up of shortfall in segregated fund	• In the event that an application fee floor is used to determine the application fee, excess fees received **must** be used to benefit the Program, ie one or more of: (a) global communication and awareness campaign about the		

	introduction and availability of new gTLDs; (b) long-term program needs – system updates, fixed assets etc; (c) Application Support Program; or (d) top-up any shortfall in the segregated fund described below		
29. Need for mechanism to deal with potential overall budget shortfall	• To help alleviate potential burden of overall shortfall, set up **separate segregated fund to absorb shortfall** and topped-up in a later round. Amount of contingency should be a predetermined value, reviewed periodically to ensure adequacy.		
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
30.			
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
31. ICANN Org's request for guidance on fee floor amount or criteria by which it is established	No agreement on specific amount or criteria, noting some public comments received to IR, suggests further study in implementation phase of what level of fee floor would effectively deter behaviours that fee floor seeks to prevent		Maintain line of enquiry with GDD on (1) elements should be factored into "cost" and (2) whether 2012 fee amount generates excess or shortfall.

			Take up as Advice to Board (if necessary and depending on timing of GDD response)
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[23] RESERVED NAMES [2.7.1]**		Priority:	**HIGH**	Settled On:	
Related:						
Key Issues:	Rules for handling Reserved Names at both Top Level and Second Level					
Policy Goals:	Existing policy is appropriate to maintain at the top level: • Recommendation 5: "Strings must not be a Reserved Word" • Recommendation 2: "Strings must not be confusingly similar to an existing top-level domain"					
Assigned CCT-RT Rec's:	None					
References:	• SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • [03. SubPro Reserved Names, Closed Generics & Registrant Protection, 20 August 2019](#)					

What has SubPro PDP WG concluded?	What will/might SubPro PDP WG recommend?	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
32. <u>RN at the Top Level</u>: High level agreement for RN for PTI and Special-Use Domain Names identified though IETF RFC 6761	• Recommendation to reserve names for PTI and to reserve Special-Use Domain Names through procedure described in IETF RFC 6761 • Also, to amend "Reserved Names" referred to in 2012 AGB to "Unavailable Names"	Yes	**Revisit with SSAC** on SAC090 or ask for any update?

33. RN at the Second Level: High level agreement for updating Schedule 5 re two-char letter-letter ASCII Labels	Recommendation to update Schedule 5 to include measures for Two-Character Letter-Letter ASCII Labels to avoid confusion with corresponding Country Codes adopted by ICANN Board, 8 Nov 2016	Yes	Revisit with GAC to establish status of discussions between GAC members and ICANN Board
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
34.			
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
35. RN at the Top Level: General requirements			
36. RN at the Top Level: ISO 4217 Currency Codes *"Reserve until such time that there is clear agreement with the International Central Banks (eg through IMF or BIS) as to whether these codes could be delegated and to which entities, not excluding themselves."*			
37. RN at the Top Level: Geonames		See: Scorecard on Geographic Names	See: Scorecard on Geographic Names
38. RN at the Top Level: IGO / INGO			

39. <u>RN at the Top Level</u>: Red Cross / Red Crescent Names			
40. <u>RN at the Top Level</u>: Removal of two-char letter-number combinations from reservation			<mark>Keep pressing for reservation of two-char letter-number combinations to avoid risk of confusion with ccTLDs (eg. O2, 3M); impact on end users coupled with questions around potential security risks</mark> <mark>Two-char letter-number ASCII TLD space should be reserved exclusively for ccTLDs?</mark>
41. <u>RN at the Second Level</u>: Voluntary reservation of up to 100 strings for operation/ promotion of TLD			
42. <u>RN at the Second Level</u>: Ability to reserve unlimited number of SL DNs for release at RO's discretion through ICANN-accredited Registrars			
43. <u>RN at the Second Level</u>: Sunrise process for SL DNs removed from RN list and released by RO			
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[24] CLOSED GENERICS [2.7.3]**	Priority:	**HIGH**	Settled On:	

Related:	• Generic terms as TLD • Single Registrant / Brand TLDs
Key Issues:	• Pursuant to GAC Beijing Communique 2013, GAC advised that, "For strings representing generic terms, exclusive registry access should serve a public interest goal" (the "Category 2.2 Safeguard Advice"), and proceeded to identify a non-exhaustive list of such 'generic' strings applicable in the 2012 round affecting 186 applicants for potential Closed Generics. • After ICANN solicited responses from those 186 applicants on their plans to operate strings as Closed Generics (through exclusive access registries, defined as registry restricted to a single person or entity and/or that person's or entity's "affiliates" per section 2.9c of the RA), all but 5 of the 186 applications agreed to withdraw their applications or change their TLDs to being "open". • A 2015 Board resolution gave the remaining applicants 3 options: (1) change to open registry; (2) maintain plan to operate Closed Generic and be deferred to next round, thus subject to new rules; or (3) withdraw and receive appropriate refund. **This effectively meant that Closed Generic / Exclusive Generic TLDs were banned in the 2012 round**. All 5 applicants – for strings: HOTELS, GROCERY, DVR, DATA, PHONE – eventually submitted change requests to "open" and these strings have since been delegated. • Notwithstanding, what rules should apply to Closed Generic applications in subsequent procedures?
Policy Goals:	Charged with analysing impact of Closed Generics for future policy purposes, SubPro PDP WG generally agrees that some form of policy guidance should be drafted but it hasn't reached consensus on path forward.
Assigned CCT-RT Rec's:	None
References:	• [ICANN: Do Not Allow Closed New gTLDs With Generic Strings, 16 February 2020](#) • SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • [03. SubPro Reserved Names, Closed Generics & Registrant Protection, 20 August 2019](#)

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
44. No consensus on path forward. In addition, per Board input, still subject to how to define "public interest" and public interest goals	Unclear except to confirm no consensus on path forward. The options considered, and which received varying responses, were: **Option 1: No Closed Generics** – Formalize GNSO policy to disallow **Option 2**: **Closed Generics with Public Interest Application** – Allow but require applicants demonstrate the CG serves a public interest goal in their application subject to Objection process **Option 3**: **Closed Generics with Code of Conduct** – Allow but require applicant commitment to a code of conduct addressing concerns expressed by those opposed to CG (through a Community Objection-like process) **Option 4**: **Allow Closed Generics subject only a Community Objection-like process**	ALAC statement AL-ALAC-ST-0926-02-01-EN to SubPro IR expressed cautious qualified support for Options 2 and 3 in the spirit of finding a compromise. *"Closed generics should be prohibited unless coupled with a Public Interest Application. Closed generics allow an applicant to have a potentially unfair influence over registration priority in a generic term, such as "app." Additionally, closed generics lead to a slippery slope that could enable significant security risks for those particular strings, particularly for dotless domains as the SSAC found. Closed generics can exist – but they may introduce unintended security and stability issues which the SSAC should weigh in on. Thus, to completely eliminate this competitive and security threat, ICANN must prohibit their use."*	• ==**Revisit with GAC** to establish currency / changes to underlying intent of GAC Beijing Communique 2013== • **Check for SSAC advice** or ask for their current position? • Given the clear lack of consensus identified by SubPro PDP WG, we may want to be more prudent and alter our position to outrightly support Option 1?
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
45.			

PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[25] STRING SIMILARITY [2.7.4]**	Priority:	**HIGH**	Settled On:	

Related:	• String Similarity Review • String Confusion Objection (under Objections [2.8.1]) • Accountability Mechanism [2.8.2]
Key Issues:	More guidance in treatment of singular vs plural versions of same words in same language/script vis a vis application, review in order to reduce risk of consumer confusion
Policy Goals:	Recommendation 2 "Strings must not be confusingly similar to an existing top-level domain" continues to be an appropriate policy objective
Assigned CCT-RT Rec's:	Rec. 35: Consider new policies to avoid potential inconsistent results in string confusion objections; in particular: 1) Determining through the initial string similarity review process that singular and plural versions of the same gTLD string should not be delegated 2) Avoiding disparities in similar disputes by ensuring that all similar cases of plural vs singular strings are examined by the same expert panellist …..
References:	• SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • 01. SubPro String Similarity, 16 August 2019

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
46. More guidance on the standard of confusing similarity in singular vs plural words; insufficient clarity in 2012 round	Recommendation for adding detailed guidance on the standard of confusing similarity as it applies to singular and plural versions on the same word, specifically: • Prohibiting plurals and singulars of the same word within the	Yes, in general, but which dictionary?	• <mark>Any particular concern with IDN variant TLDs?</mark> • Any further need to **discuss with SSAC** on their comment re: a clear and consistent set of rules for 'confusing similarity' to be

	same language/script to reduce risk of consumer confusion (eg. .CAR and CARS) • Expanding scope of String Similarity Review to cover singular/plurals of TLDs on a per language basis: (1) if these are confusingly similar then place in a contention set (2) disallow application for a single/plural variation of an existing TLD (3) consider meaning of strings and not automatically disqualify on basis a single letter difference (eg. .NEW and .NEWS) (4) by using a dictionary		developed in accordance with the Conservatism Principle?
47. Eliminating SWORD tool	Recommendation to not use SWORD in subsequent procedures	Yes, SWORD was a disaster	Review replacement process/tool
48. Non- possibility to apply for string "still in system"	Recommendation to disallow fresh applications for any string that is still being processed from a previous application opportunity	• Yes, logically correct, otherwise may lead to unintended contention set. • Also need to have process to terminate any application that has little chance of succeeding and which are not withdrawn in subsequent procedures	Monitor implementation
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?

49.			
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
50. Synonyms in String Similarity Review			Revisit with GAC especially in context of Verified TLDs / standard for strings in highly-regulated sectors
51. Treatment of homonyms			Thoughts?
52. Timing of review vs objection			Monitor implementation – String Similarity Review should be concluded before Objection period starts to allow for meaningful objections and appeal processes.
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[26] INTERNATIONALIZED DOMAIN NAMES (IDN) [2.7.5]**		Priority:	**HIGH**	Settled On:	

Related:	• IDN Variant TLD Implementation • Root Zone Label Generation Rules (RZ-LGRs) • **Risk of DNS Abuse** • **TO NOTE: GNSO Council has convened scoping team to examine policy implications from IDN Varian TLD Implementation and Final Proposed Draft Version 4.0 of the IDN Implementation Guidelines – after examination, team will accordingly suggest to GNSO Council a mechanism (eg SubPro, new PDP/EPDP, other) to address issues**
Key Issues:	Promotion of IDNs and treatment of IDN variants
Policy Goals:	Principle B remains applicable, though can be modified slightly to acknowledge IDNs already in the new gTLD space: "Some new gTLDs should be internationalised domain names (IDNs) subject to the approval of IDNs being available in the root."
Assigned CCT-RT Rec's:	None
References:	• SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • 01. SubPro IDNs, 26 August 2019

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
53. IDNs should continue to be an integral part of the program going forward	Recommendation for intent behind Principle B to remain but per UA: Recommendation: WG recommends revising Principle B to read *"Some new gTLDs should be IDNs. Applicants should be made aware of UA challenges in ASCII and IDN TLDs. They should be given access to*	Yes, with suggested amendment that applicants MUST (instead of "should") be given access to all applicable information about UA etc.	

	all applicable information about UA currently maintained on ICANN's Universal Acceptance Initiative page, through the UASG, as well as future efforts."		
54. Compliance with RZ-LGRs should be required for generation of IDN TLDs and valid variant labels	Compliance with Root Zone Label Generation Rules should be required for generation of IDN TLDs and valid variant labels		
55. 1-Unicode character gTLDs permissible for script/language combinations in specific circumstances	1-Unicode character gTLDs may be allowed for script/language combinations where a character is an ideograph (or ideogram) and do not introduce confusion risks that rise above commonplace similarities, consistent with SSAC and Joint ccNSO-GNSO IDN Workgroup (JIG) reports		
56. Automation of compliance with IDNA2008 and applicable RZ-LGRs desirable	To the extent possible, compliance with IDNA2008 (RFCs 5890-5895) or its successors and applicable RZ-LGRs Rules be automated for future applicants		
57. Whether compliance with IDNA2008 and applicable RZ-LGRs removes need for PDT	Compliance with IDNA2008 and applicable RZ-LGRs for scripts an applicant intends to support, then PDT should be unnecessary for the relevant scripts	Not necessarily. We commented that the prudent path would be to maintain PDT regardless. Because PDF covers testing of aspects that could potentially impact stability and manageability of RO operations – DNS, WHOIS, EPP, IDN, Data	<mark>Suggest to maintain PDT regardless of compliance with IDNA2008 or RZ-LGRs?</mark>

		Escrow and Documentation – and IDN variants introduce added complexity to RO operations even if compliant with IDNA2008 or RZ-LGRs.	
58. Same-entity rule for IDNs and their respective variants	IDN gTLDs deemed to be variants of already existing or applied for TLDs will be allowed provided (1) they have the same RO implementing by force of written agreement, a policy of cross-variant TLD bundling and (2) the applicable RZ-LGR is already available at time of application submission		
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
59.			
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
60. RZ-LGRs limited to generating IDN variants?	What about when RZ-LGRs are not yet in existence? Should absence lead to variant label being blocked or not being able to be allocated?		
61. Bundling of SL IDN variants			
62. Making definition of 1-Unicode character gTLDs more precise			Especially relevant to CJK, should get additional inputs from CKJ communities

63. Coordination with IDN Variant Management Framework		<mark>Risk of DNS Abuse addressed?</mark>	
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	[27] SECURITY AND STABILITY [2.7.6]		Priority:	HIGH	Settled On:	

Related:	**Delegation Rates** - Emojis - DNS Abuse mitigation - Systems [2.4.3] – algorithmic checking of TLDs against RZ-LGRs and ASCII string requirements
Key Issues:	- What is a safe rate of delegation of new gTLDs into the root zone? - Banning of emojis as TLDs
Policy Goals:	In respect of Delegation Rates: - The New gTLD Program should be introduced in an ongoing, orderly, timely and predictable manner - Primary purpose of new gTLDs are to foster diversity, encourage competition and enhance utility of DNS - New gTLDs should be delegated into the root zone in a manner that minimises risk of harming operational stability, security and global interoperability of the Internet Implementation Guidance: The application submission system should do all feasible algorithmic checking of TLDs, including against RZ-LGRs and ASCII string requirements to better ensure only valid ASCII and IDN TLDs can be submitted. A proposed TLD might be algorithmically found to be valid or invalid, or verifying its validity may not be possible using algorithmic checking. Only in the latter case, when a proposed TLD doesn't fit all the conditions for automatic checking, a manual review should occur to validate or invalidate the TLD.
Assigned CCT-RT Rec's:	? Rec. 14: Pro-active anti-abuse measures (high priority for SubPro) ? Rec. 16: Support ongoing data collection efforts (eg DAAR) (high priority for SubPro)
References:	SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
64. Be conservative in adding new gTLDs to RZ	In delegating new gTLDs, WG agrees with RSSAC that trouble-free access	Yes	

	to RZ is absolutely critical for all Internet users and therefore ICANN should honor the principle of conservatism when adding new gTLDs to the RZ		
65. Focus on rate of change in RZ	As recommended by both SSAC and RSSAC, ICANN should focus on rate of change in RZ, rather than total number of delegated strings for a given calendar year. Better to think in terms of changes over smaller time periods (eg monthly) • From SAC100 ICANN should focus on the rate of change for the RZ, rather than total number of delegated strings for a given calendar year • From RSSAC031 Rate of change more important than absolute magnitude, based on historical trends and operational experience, number of TLDs delegated in the RZ should not increase by more than circa 5% per month, minor variations from time to time allowed	Yes	
66. Early warning systems to monitor delegation rates desirable	From SAC100 ICANN should continue developing the monitoring and early warning capability with respect to RZ scaling.	Yes	

	This investigation should be completed prior to increasing number of delegations in the RZ		
67. Support RSSAC recommendations	From RSSAC031 • Rate of change more important than absolute magnitude, based on historical trends and operational experience, number of TLDs delegated in the RZ should not increase by more than circa 5% per month, minor variations from time to time allowed • The RZ is uniquely a shared resource upon which all Internet users rely, so it continues to be important to limit rate of adding new gTLDs	Yes	
68. Support for SSAC recommendations	From SAC100 • ICANN should structure its obligations to new gTLD registries so that it can delay addition to RZ in case of DNS service instabilities • ICANN should investigate and catalog long term obligations of maintaining a larger RZ	Yes	
69. Role for and action by CTO	Recommendation that OCTO consult with PTI, Verisign, root operators via RSSAC and larger DNS		

	technical community on above recommendations		
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
70.	•		
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
71. CCT-RT Recommendations 14 and 16 on DNS Abuse mitigation			
Position:			

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[29] REGISTRANT PROTECTIONS [2.7.2]**		Priority:	**MEDIUM**	Settled On:	
Related:	• EBERO – Emergency Back-end Registry Operator • COI – Continued Operations Instrument • Data Escrow, RO performance specifications in Specification 10 RA					
Key Issues:	In context of consumer protection: • Whether EBERO and COI should continue to be used to protect registrants? Exemptions tol apply? Any changes required? • Level of applicant screening required.					
Policy Goals:	• Principle D remains applicable: "A set of technical criteria must be used for assessing a new gTLD registry applicant to minimise risk of harming the operational stability, security and global interoperability of the Internet" • The program must continue to incorporate measures into the application process and program implementation that provide protection for registrants					
Assigned CCT-RT Rec's:	None					
References:	• SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • 03. SubPro Reserved Names, Closed Generics & Registrant Protection, 20 August 2019					

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
72. Maintaining registrant protections as is	Recommendation to: • Maintain existing registrant protections, including EBERO and associated triggers for an EBERO event and critical registry functions		

	• Provide exemptions from EBERO requirements to TLDs with applicable Spec 9 RO CoC and Spec 13 .Brand TLDs		
73. Improving applicant screening process	Recommendation to improve background screening process to be more accommodating, meaningful, and flexible for different regions and in different circumstances	Yes	Monitor at implementation level: • No exemption to background screening for public traded companies • Background screening ideally done twice: (1) time of application (to identify unsuitable applicants) and (2) time of contracting (to identify material change)
What has SubPro PDP WG concluded?	**What SubPro PDP WG will likely omit?**	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
74.			
PENDING ISSUES:	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
75. Exemptions from COI	Unclear if exemptions from COI also to be provided under certain circumstances		
Position:			