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ORIGINAL: English
DATE: 04 May 2020
STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE

ALAC Statement on Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process

Introduction

On 18 March 2020, Public Comment opened for Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process. On the same day, an At-Large workspace was created for the statement. The At-Large Consolidated Policy Working Group (CPWG) decided it would be in the interest of end users to develop an ALAC statement on the Public Comment.

A drafting team was formed, including Greg Shatan, member of the North American Regional At-Large Organization (NARALO), and Marita Moll, ALAC Member of the NARALO. Greg Shatan and Marita Moll presented during the CPWG meetings on At-Large consensus on the Public Comment. The topic was discussed on the CPWG and At-Large mailing lists.

On 29 April 2020, the drafting team presented the draft responses for input into the ICANN Public Comment form, to the CPWG.

On 04 May 2020, the drafting team finalized the ALAC statement.

On 04 May 2020, the ALAC Chair, Maureen Hilyard, requested that the statement be transmitted to the ICANN PubliC Comment process, copying the ICANN staff member responsible for this topic, with a note that the statement is pending ALAC ratification.

On 07 May 2020, staff confirmed the online vote resulted in the ALAC endorsing the statement with 13 votes in favor, 0 votes against, and 0 abstentions. Please note 100% (15) of the 15 ALAC Members participated in the poll. The ALAC Members who participated in the poll are (alphabetical order by first name): Bastiaan Goslings, Carlos Raul Gutierrez, Dave Kissoondoyal, Holly Raiche, Humberto Carrasco (voted after poll close), Javier Rua-Jovet, Joanna Kulesza, Jonathan Zuck, Justine Chew, Marita Moll, Matthias Hudobnik, Maureen Hilyard, Sylvia Herlein Leite and Tijani Ben Jemaa. 2 ALAC Members, Abdulkarim Oloyede and Justine Chew, abstained. You may view the result independently under:
https://www.bigpulse.com/pollresults?code=1339200HFGFduBvCpjTh5c8wVYz

ALAC Statement on Phase 1 Initial Report of the Review of All Rights Protection Mechanisms in All gTLDs Policy Development Process

COPY OF ICANN PUBLIC COMMENT FORM SUBMISSION

Review of All Rights Protection Mechanisms (RPMs) in All gTLDs PDP Working Group - Phase 1 Initial Repot - Public Comment Input Form

This Public Comment forum seeks community feedback on the Phase 1 Initial Report published by the Review of All Rights Protection Mechanisms (RPMs) in All gTLDs Policy Development Process (PDP) Working Group.

* Required

1. Email address *

staff@atlarge.icann.org

2. Please provide your name: *

At-Large Staff

3. Please provide your affiliation *

At-Large Advisory Committee (ALAC)

4. Are you providing input on behalf of another group (e.g., organization, company, government)? *

Mark only one oval.

- ′e
- _
- No

5. If yes, please explain:

Staff submission on behalf of At-Large Advisory Committee (ALAC)

Save Your Progress

6. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- ′es
- lo, I would like to continue to the next section

Section 3: URS Preliminary Recommendations & Community Questions

URS Recommendation #1

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/byCJBw Note:

URS Recommendation #1 has an associated URS Question #1 below.

7. Please choose one of the following responses for URS Recommendation #1:

   Mark only one oval.

   - [ ] Support Recommendation as written
   - [ ] Support Recommendation concept with minor change
   - [ ] Significant change required
   - [ ] Do not support Recommendation
   - [ ] No opinion

8. If you wish to (a) propose changes to URS Recommendation #1; and/or (b) provide a rationale for your response, please do so here.

The Working Group believes that its recommendation is consistent with the EPDP Phase 1 Recommendations #21, #23, and #27.

URS Question #1

Please find the link to this Question and its context here: https://community.icann.org/x/cCaJBw

Note: URS Question #1 is related to URS Recommendation #1.

9. URS Q1a. Should URS Rule 15(a) be amended to clarify that, where a Complaint has been updated with registration data provided to the Complainant by the URS Provider, there must be an option for the Determination to be published without the updated registration data?

Mark only one oval.

- ′e
-
- lo
- No opinion
-)ther:

10. URS Q1b. If so, when, by whom, and how should this option be triggered?

N/A

11. URS Q1c. Are there any operational considerations that will need to also be addressed in triggering this option?

N/A

URS Recommendation #2

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/hCGJBw

12. Please choose one of the following responses for URS Recommendation #2:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

13. If you wish to (a) propose changes to URS Recommendation #2; and/or (b) provide a rationale for your response, please do so here.

Consistent with GDPR implementation and EPDP Recommendations 23 and 27.

URS Recommendation #3

Please find the link to this Recommendation and its context here: https://community.icann.org/x/hiGJBw

14. Please choose one of the following responses for URS Recommendation #3:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

15. If you wish to (a) propose changes to URS Recommendation #3; and/or (b) provide a rationale for your response, please do so here.

Translation of complaint into predominant language of the Respondent is consistent with ALAC principles.

URS Recommendation #4

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/XyCJBw Note:

URS Recommendation #4 has an associated URS Question #2 below.

16. Please choose one of the following responses for URS Recommendation #4:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

17. If you wish to (a) propose changes to URS Recommendation #4; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of accountability, reliance on metrics and ability to seek redress.

URS Question #2

Please find the link to this Question and its context here: https://community.icann.org/x/XyCJBw

Note: URS Question #2 is related to URS Recommendation #4.

18. URS Q2a. What compliance issues have Registries and Registrars discovered in URS processes, if any?

N/A

19. URS Q2b. Do you have suggestions for how to enhance compliance of URS Providers, Registries, and Registrars in the URS process?

N/A

URS Recommendation #5

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/cSCJBw Note:

URS Recommendation #5 has an associated URS Question #3 below.

20. Please choose one of the following responses for URS Recommendation #5:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

21. If you wish to (a) propose changes to URS Recommendation #5; and/or (b) provide a rationale for your response, please do so here.

Process improvement.

URS Question #3

Please find the link to this Question and its context here: https://community.icann.org/x/cSCJBw

Note:
• The Working Group recommends that public comment be sought from Registry Operators.
• URS Question #3 is related to URS Recommendation #5

22. URS Q3a. Question to Registry Operators -- Have Registry Operator experienced any issues with respect to receiving notices from URS Providers?

Mark only one oval.

- [ ] Yes
- [ ]
- [ ] No

Not sure

- [ ] Other: N/A: For registry operators only.

23. URS Q3b. Question to Registry Operators -- Were these notices sent through appropriate channels?

Mark only one oval.

- ′e
-
- lo
- Not sure
-)ther: N/A: For registry operators only.

24. URS Q3c. Question to Registry Operators -- Did the notices contain the correct information?

Mark only one oval.

- ′e
-
- lo
- Not sure
-)ther: N/A: For registry operators only.

URS Recommendation #6

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/iCGJBw Note:

URS Recommendation #6 has an associated URS Question #4 below.

25. Please choose one of the following responses for URS Recommendation #6:

Mark only one oval.

- ;upport Recommendation as written

Support Recommendation concept with minor change

Significant change required

Do not support Recommendation

No opinion

26. If you wish to (a) propose changes to URS Recommendation #6; and/or (b) provide a rationale for your response, please do so here.

Provides assistance to those who may not be able to afford the assistance of counsel.

URS Question #4

Please find the link to this Question and its context here: https://community.icann.org/x/iCGJBw Note:

URS Question #4 is related to URS Recommendation #6.

27. URS Q4a. What content and format should these educational materials have?

Content should be readily accessible to the average reader.

28. URS Q4b. How should these educational materials be developed?

Collaboration with both experienced individuals, organizations and end users.

29. URS Q4c. Who should bear the cost for developing these educational materials?

URS providers should bear the cost of providing these materials as, in the end, it will save time and effort in any proceedings.

30. URS Q4d. Should translations be provided?

Mark only one oval.

- Ye
-
- lo
- No opinion
- Other: Yes, at a minimum to the usual ICANN languages; also to languages in which URS cases could be brought.

URS Recommendation #7

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/iiGJBw

31. Please choose one of the following responses for URS Recommendation #7:

Mark only one oval.

- upport Recommendation as written
- upport Recommendation concept with minor change
- ignificant change required
- o not support Recommendation
- lo opinion

32. If you wish to (a) propose changes to URS Recommendation #7; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of accountability and transparency.

URS Recommendation #8

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/jCGJBw Note:

URS Recommendation #8 has an associated URS Question #5 below.

33. Please choose one of the following responses for URS Recommendation #8:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

34. If you wish to (a) propose changes to URS Recommendation #8; and/or (b) provide a rationale for your response, please do so here.

Technical Issues not of significant concern to end-users.

URS Question #5

Please find the link to this Question and its context here: https://community.icann.org/x/jCGJBw Note:

URS Question #5 is related to URS Recommendation #8.

35. URS Q5. Should the Registry Requirement 10 be amended to include the possibility for another Registrar, which is different from the sponsoring Registrar but accredited by the same Registry, to be elected by the URS Complainant to renew the URS Suspended domain name, and to collect the Registrar renewal fee?

Mark only one oval.

- [ ] Ye
- [ ]
- [ ] lo
- [ ] No opinion
- [ ] Other: No opinion. Technical Issues not of significant concern to end-users.

URS Recommendation #9

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/jiGJBw

36. Please choose one of the following responses for URS Recommendation #9:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

37. If you wish to (a) propose changes to URS Recommendation #9; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of using primary languages of participants where possible.

URS Recommendation #10

Please find the link to this Recommendation and its context here: h ttps://community.icann.org/x/kCGJBw Note:

URS Recommendation #10 has an associated URS Question #6 below.

38. Please choose one of the following responses for URS Recommendation #10:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

39. If you wish to (a) propose changes to URS Recommendation #10; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of using primary languages of participants where possible.

URS Question #6

Please find the link to this Question and its context here: https://community.icann.org/x/kCGJBw

Note: URS Question #6 is related to URS Recommendation #10.

40. URS Q6. Who has the responsibility for developing the uniform set of basic FAQs for URS Complainants and Respondents?

Providers, in collaboration with both experienced individuals, organizations and end users.

URS Question #7

Please find the link to this Question and its context here: https://community.icann.org/x/dSCJBw

41. URS Q7. What mechanism do you suggest that allows a URS Provider to efficiently check with other URS and UDRP Providers in order to ensure that a disputed domain name is not already subject to an open and active URS/UDRP proceeding?

No opinion, technical issue not of significant interest to end-users.

URS Question #8

Please find the link to this Question and its context here: https://community.icann.org/x/kiGJBw Note:

The Working Group recommends that public comment be sought from Registry Operators.

42. URS Q8a. Question to Registry Operators -- What issues have you encountered with respect to implementing the HSTS-preloaded domain suspension remedy, if any?

N/A

43. URS Q8b. Question to Registry Operators -- What would need to be done to help resolve the issues you have encountered?

N/A

URS Question #9

Please find the link to this Question and its context here: https://community.icann.org/x/lCGJBw

44. URS Q9. Are the non-refundable, late Response fees paid by Respondent reasonable?

No opinion. Issue not of significant interest to end-users.

URS Question #10

Please find the link to this Question and its context here: https://community.icann.org/x/liGJBw

45. URS Q10a. Are penalties for Complainant or Respondent who abuses the URS process sufficient?

No opinion. Issue not of significant interest to end-users.

46. URS Q10b. If not, should they be expanded?

Mark only one oval.

- Yes
-
- No
- No opinion
- Other: No opinion. Issue not of significant interest to end-users.

47. URS Q10c. If they should be expanded, how?

No opinion. Issue not of significant interest to end-users.

Save Your Progress

48. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- Yes
- No, I wish to continue to the next section

Section 4: TMCH Preliminary Recommendation

This section seeks to obtain input on the preliminary recommendation related to the Trademark Clearinghouse (TMCH)

TMCH Recommendation #1

Please find the link to this Recommendation and its context here: https://community.icann.org/x/mSGJBw

49. Please choose one of the following responses for TMCH Recommendation #1:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

50. If you wish to (a) propose changes to TMCH Recommendation #1; and/or (b) provide a rationale for your response, please do so here.

The current rules appear to be working as intended.

Save Your Progress

51. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- Yes
- No, I wish to continue to the next section

Section 5: Sunrise Service Preliminary Recommendations & Community Questions

This section seeks to obtain input on all the preliminary recommendations and questions related to the Sunrise service offered through the TMCH.

Sunrise Recommendation #1

Please find the link to this Recommendation and its context here: https://community.icann.org/x/rSGJBw

52. Please choose one of the following responses for Sunrise Recommendation #1:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

53. If you wish to (a) propose changes to Sunrise Recommendation #1; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Recommendation #2

Please find the link to this Recommendation and its context here: https://community.icann.org/x/ryGJBw

54. Please choose one of the following responses for Sunrise Recommendation #2:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

55. If you wish to (a) propose changes to Sunrise Recommendation #2; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of allowing ICANN policies to operate as written.

Sunrise Recommendation #3

Please find the link to this Recommendation and its context here: https://community.icann.org/x/siGJBw

56. Please choose one of the following responses for Sunrise Recommendation #3:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

57. If you wish to (a) propose changes to Sunrise Recommendation #3; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Recommendation #4

Please find the link to this Recommendation and its context here: https://community.icann.org/x/tCGJBw

58. Please choose one of the following responses for Sunrise Recommendation #4:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

59. If you wish to (a) propose changes to Sunrise Recommendation #4; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Recommendation #5

Please find the link to this Recommendation and its context here: https://community.icann.org/x/tiGJBw

60. Please choose one of the following responses for Sunrise Recommendation #5:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

61. If you wish to (a) propose changes to Sunrise Recommendation #5; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Recommendation #6

Please find the link to this Recommendation and its context here: https://community.icann.org/x/uCGJBw

62. Please choose one of the following responses for Sunrise Recommendation #6:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

63. If you wish to (a) propose changes to Sunrise Recommendation #6; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Recommendation #7

Please find the link to this Recommendation and its context here: https://community.icann.org/x/uiGJBw

64. Please choose one of the following responses for Sunrise Recommendation #7:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

65. If you wish to (a) propose changes to Sunrise Recommendation #7; and/or (b) provide a rationale for your response, please do so here.

These are process improvements that will allow policies to work as intended and improve transparency and comprehension by all involved.

Sunrise Recommendation #8

Please find the link to this Recommendation and its context here: https://community.icann.org/x/vCGJBw

66. Please choose one of the following responses for Sunrise Recommendation #8:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

67. If you wish to (a) propose changes to Sunrise Recommendation #8; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Sunrise Question #1

Please find the link to this Question and its context here: https://community.icann.org/x/viGJBw

68. Sunrise Q1. What remedy(ies) would you propose for any unintended effects of the Sunrise Period that you have identified in your public comment?

N/A

Sunrise Question #2

Please find the link to this Question and its context here: https://community.icann.org/x/wCGJBw

69. Sunrise Q2a. Have you identified abuses of the Sunrise Period?

Mark only one oval.

- ′e
-
- lo
- Not sure
-)ther:

70. Sunrise Q2b. To the extent that you have identified abuses of the Sunrise Period, if any, please describe them and specify any documentation to substantiate the identified abuses.

N/A

Sunrise Question #3

Please find the link to this Question and its context here: https://community.icann.org/x/wiGJBw

Note:

- The Working Group recommends that public comment be sought on questions #3a-d from Registry Operators.
- The Working Group asks Registry Operators to be specific about which program(s) (i.e., ALP , QLP , and/or LRP) they are referring in their responses to all questions and what the shortcomings of each of those mechanisms are.
- The Working Group also recommends that public comment be sought on question #3e from non-Registry Operators.

71. Sunrise Q3a-1. Question to Registry Operators -- If you did not attempt an ALP, QLP, or LRP, was the reason for not taking advantage of those programs related to how they integrate with Sunrise?

N/A: applies to Registry Operators only.

72. Sunrise Q3a-2. Question to Registry Operators -- Were you able to achieve your goals in a different way (such as by combining any or all of these programs)?

N/A: applies to Registry Operators only.

73. Sunrise Q3b-1. Question to Registry Operators -- If you did attempt an ALP, QLP, or LRP (or combination) but didn't successfully use any, was the reason you did not take advantage of those programs related to how they integrate with Sunrise?

N/A: applies to Registry Operators only.

74. Sunrise Q3b-2. Question to Registry Operators -- Were you able to achieve your goals in a different way? For instance, some Registry Operators may have used the QLP 100 (Section 3.2 of Registry Agreement Specification 5) (plus IDN variants) in combination with registry-reserved names to obtain the names they needed. Did you do this?

N/A: applies to Registry Operators only.

75. Sunrise Q3b-3. Question to Registry Operators -- If so, were you able to reserve or allocate all the names you needed to?

N/A: applies to Registry Operators only.

(or combination), did you experience any unanticipated trouble with integrating the Sunrise Period into your launch?

N/A: applies to Registry Operators only.

77. Sunrise Q3c-2. Question to Registry Operators -- Specifically, were you able to allocate all of the names you needed to allocate under those programs before the Sunrise Period?

N/A: applies to Registry Operators only.

78. Sunrise Q3d-1. Question to Registry Operators -- For each issue you have identified in your responses to questions #3a-c, please also include a suggested mitigation path. What do you suggest the RPM Working Group consider to help alleviate the pain points and make those programs more useful and functional, while still respecting the trademark protection goals of the Sunrise Period?

N/A: applies to Registry Operators only.

changes to these programs before another round of new gTLDs (that is, are these issues worth “holding up” another round for, or are the work-arounds tolerable)?

N/A: applies to Registry Operators only.

80. Sunrise Q3e. Question to Non-Registry Operators -- Did you experience struggles with the way ALP, QLP, or LRPs (or a combination) integrated with Sunrise, either as registrar, as a brand owner, or as a domain name registrant?

N/A: applies to Registry Operators only.

Sunrise Question #4

Please find the link to this Question and its context here: https://community.icann.org/x/xCGJBw Note: The

Working Group recommends that the following guidance be sought from Registry Operators.

81. Sunrise Q4a-1. Question to Registry Operators -- If you had/have a business model that was in some way restrained by the 100-name pre Sunrise limit for names registries can reserve under Section 3.2 of Registry Agreement Specification 5, or the practical problems with the ALP, please share your experience and suggested path to improvement.

N/A: applies to Registry Operators only.

82. Sunrise Q4a-2. Question to Registry Operators -- What was your work-around, if any? For instance, if you withheld names from registration (“reserved” names), how well did that work?

N/A: applies to Registry Operators only.

83. Sunrise Q4b-1. Question to Registry Operators -- If the Working Group were to identify specialized gTLDs as a key concern that required changes to the way the Sunrise Period operates, are there other TLDs, besides GeoTLDs that did or will encounter the same problem?

N/A: applies to Registry Operators only.

84. Sunrise Q4b-2. Question to Registry Operators -- What suggestions do you have for work-arounds or solutions that will not diminish the protections available from the Sunrise Period (balanced with the need to finish this work in a timely manner)?

N/A: applies to Registry Operators only.

85. Sunrise Q4c-1. Question to Registry Operators -- Did you initially intend (prior to the implementation of Sunrise rules in the original Applicant Guidebook) to offer a special Sunrise before the regular Sunrise that targeted local trademark owners?

Mark only one oval.

- Yes
-
- No
- Not sure
- Other: N/A: applies to Registry Operators only.

86. Sunrise Q4c-2. Question to Registry Operators -- For instance, would the ability to offer a special “pre-Sunrise” Sunrise solve any problems?

Mark only one oval.

- Yes
-
- No
- No opinion
- Other: N/A: applies to Registry Operators only.

87. Sunrise Q4c-3. Question to Registry Operators -- If so, would you have validated the marks in some way?

Mark only one oval.

- Yes
-
- No
- No opinion
- Other: N/A: applies to Registry Operators only.

88. Sunrise Q4c-4. Question to Registry Operators -- How would you have resolved conflicts between trademark holders that got their domains during the first Sunrise and trademark holders who had an identical trademark in the TMCH that was registered prior to Sunrise?

N/A: applies to Registry Operators only.

Sunrise Question #5

Please find the link to this Question and its context here: https://community.icann.org/x/xiGJBw

Note: The Working Group recommends that public comment be sought from trademark holders who use non- English scripts/languages.

89. Sunrise Q5a. Question to trademark holders who use non-English scripts/languages -- Did you encounter any problems when you attempted to participate in Sunrise using non-English scripts/languages?

Mark only one oval.

- Yes
-
- No
- Not sure
- Other: N/A: applies to trademark holders only.

90. Sunrise Q5b. Question to trademark holders who use non-English scripts/languages -- If so, please describe problems you have encountered.

N/A: applies to trademark holders only.

91. Sunrise Q5c. Question to trademark holders who use non-English scripts/languages -- Do you have suggestions on how to enable trademark holders who use non-English scripts/languages to effectively participate in Sunrise?

N/A: applies to trademark holders only.

Save Your Progress

92. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- Yes
- No, I wish to continue to the next section

Section 6: Trademark Claims Service Preliminary Recommendations & Community Questions

- This section seeks to obtain input on all the preliminary recommendations and questions related to the Trademark Claims service offered through the TMCH.
- Related Trademark Claims preliminary recommendations and questions are placed next to each other for easy reference.

Trademark Claims Recommendation #1

Please find the link to this Recommendation and its context here: https://community.icann.org/x/2yGJBw Note:

Trademark Claims Recommendation #1 has an associated Trademark Claims Question #1 below.

93. Please choose one of the following responses for Trademark Claims Recommendation #1:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

94. If you wish to (a) propose changes to Trademark Claims Recommendation #1; and/or (b) provide a rationale for your response, please do so here.

Consistent with policies of transparency, clarity and comprehensibility for the broadest group of end-users and other participants. Also consistent with principles of turning to multiple points of experience in the global community.

Trademark Claims Question #1

Please find the link to this Question and its context here: https://community.icann.org/x/2yGJBw

Note: Trademark Claims Question #1 is related to Trademark Claims Recommendation #1.

95. Trademark Claims Q1a-1. Have you identified any inadequacies or shortcomings of the Claims Notice?

Mark only one oval.

- [ ] Yes
- [ ]
- [ ] No

Not sure

- [ ] Other: N/A

96. Trademark Claims Q1a-2. If so, what are they?

N/A

97. Trademark Claims Q1b. Do you have suggestions on how to improve the Claims Notice in order to address the inadequacies or shortcomings?

N/A

Trademark Claims Recommendation #2

Please find the link to this Recommendation and its context here: https://community.icann.org/x/3SGJBw

98. Please choose one of the following responses for Trademark Claims Recommendation #2:

Mark only one oval.

- [ ] Support Recommendation as written
- [ ] Support Recommendation concept with minor change
- [ ] Significant change required
- [ ] Do not support Recommendation
- [ ] No opinion

99. If you wish to (a) propose changes to Trademark Claims Recommendation #2; and/or (b) provide a rationale for your response, please do so here.

Consistent with principles of supporting uses of languages other than English and using primary languages of participants.

Trademark Claims Recommendation #3

Please find the link to this Recommendation and its context here: https://community.icann.org/x/3yGJBw

100. Please choose one of the following responses for Trademark Claims Recommendation #3:

Mark only one oval.

- Support Recommendation as written
- Support Recommendation concept with minor change
- Significant change required
- Do not support Recommendation
- No opinion

101. If you wish to (a) propose changes to Trademark Claims Recommendation #3; and/or (b) provide a rationale for your response, please do so here.

No opinion; technical issue.

Trademark Claims Recommendation #4

Please find the link to this Recommendation and its context here: https://community.icann.org/x/4SGJBw Note:

Trademark Claims Recommendation #4 has an associated Trademark Claims Question #2 below.

102. Please choose one of the following responses for Trademark Claims Recommendation #4:

Mark only one oval.

- [ ] upport Recommendation as written
- [ ] upport Recommendation concept with minor change
- [ ] ignificant change required
- [ ] o not support Recommendation
- [ ] lo opinion

103. If you wish to (a) propose changes to Trademark Claims Recommendation #4; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Trademark Claims Recommendation #5

Please find the link to this Recommendation and its context here: https://community.icann.org/x/4yGJBw Note:

Trademark Claims Recommendation #5 has an associated Trademark Claims Question #2 below.

104. Please choose one of the following responses for Trademark Claims Recommendation #5:

Mark only one oval.

- [ ] upport Recommendation as written
- [ ] upport Recommendation concept with minor change
- [ ] ignificant change required
- [ ] o not support Recommendation
- [ ] lo opinion

105. If you wish to (a) propose changes to Trademark Claims Recommendation #5; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Trademark Claims Question #2

Please find the link to this Question and its context here: https://community.icann.org/x/5yGJBw Note:

Trademark Claims Question #2 is related to Trademark Claims Recommendations #4 & #5.

106. Trademark Claims Q2a. Is there a use case for exempting a gTLD that is approved in subsequent expansion rounds from the requirement of a mandatory Claims Period due to the particular nature of that gTLD? Such type of gTLD might include: (i) “highly regulated” TLDs that have stringent requirements for registering entities, on the order of .bank; and/or (ii) “Dot Brand” TLDs whose proposed registration model demonstrates that the use of a Trademark Claims Service is unnecessary.

N/A

107. Trademark Claims Q2b. If the Working Group recommends exemption language, what are the appropriate guardrails ICANN should use when granting the exception (e.g. Single-registrant? Highly-regulated or manually hand-registered domains? Something else?)?

N/A

Trademark Claims Recommendation #6

Please find the link to this Recommendation and its context here: https://community.icann.org/x/5SGJBw

108. Please choose one of the following responses for Trademark Claims Recommendation #6:

Mark only one oval.

- [ ] upport Recommendation as written
- [ ] upport Recommendation concept with minor change
- [ ] ignificant change required
- [ ] o not support Recommendation
- [ ] lo opinion

109. If you wish to (a) propose changes to Trademark Claims Recommendation #6; and/or (b) provide a rationale for your response, please do so here.

The current policies appear to be working as intended.

Save Your Progress

110. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- [ ] es
- [ ] lo, I wish to continue to the next section

Section 7: TM- PDDRP Preliminary Recommendation

This section seeks to obtain input on the preliminary recommendation related to the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP).

TM-PDDRP Recommendation #1

Please find the link to this Recommendation and its context here: https://community.icann.org/x/9SOJBw

111. Please choose one of the following responses for TM-PDDPR Recommendation #1:

Mark only one oval.

- upport Recommendation as written
- upport Recommendation concept with minor change
- ignificant change required
- o not support Recommendation
- lo opinion

112. If you wish to (a) propose changes to TM-PDDRP Recommendation #1; and/or (b) provide a rationale for your response, please do so here.

This is a process improvement that appears consistent with carrying out the intent of current policies.

Save Your Progress

113. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- es
- lo, I wish to continue to the next section

Section 8: URS Individual Proposals (Non-Recommendations)

- This section seeks to obtain input on all the individual proposals related to the Uniform Rapid Suspension System (URS). These proposals were submitted by individual working group members but did not rise to the level of becoming preliminary recommendations.

- Please note that some Individual Proposals contain associated questions that the Working Group specifically invites public comment.

URS Individual Proposal #1

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/6iGJBw

114. Please choose one of the following responses for URS Individual Proposal #1:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

115. If you wish to (a) propose changes to URS Individual Proposal #1; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #2

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/fSCJBw

Note: The Working Group particularly seeks public comment from the Contracted Parties House with regard to this proposal

116. Please choose one of the following responses for URS Individual Proposal #2:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

117. If you wish to (a) propose changes to URS Individual Proposal #2; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #3

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/7CGJBw

118. Please choose one of the following responses for URS Individual Proposal #3:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

119. If you wish to (a) propose changes to URS Individual Proposal #3; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #6

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/7iGJBw

120. Please choose one of the following responses for URS Individual Proposal #6:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

121. If you wish to (a) propose changes to URS Individual Proposal #6; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #11

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/8CGJBw Note:

URS Individual Proposal #11 has specific questions below seeking public comment.

122. Please choose one of the following responses for URS Individual Proposal #11:

Mark only one oval.

- upport Proposal as written
- upport Proposal concept with minor change
- ignificant change required
- o not support Proposal
- lo opinion

123. If you wish to (a) propose changes to URS Individual Proposal #11; and/or (b) provide a rationale for your response, please do so here.

N/A

124. URS Individual Proposal #11 - Q1. Should the current Response Fee threshold of fifteen (15) domain names be lowered?

Mark only one oval.

- e
-
- lo

No opinion

- ther:

125. URS Individual Proposal #11 - Q2. If so, what should be the new threshold?

N/A

URS Individual Proposal #13

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/fyCJBw Note:

URS Individual Proposal #13 has a specific question below seeking public comment.

126. Please choose one of the following responses for URS Individual Proposal #13:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

127. If you wish to (a) propose changes to URS Individual Proposal #13; and/or (b) provide a rationale for your response, please do so here.

N/A

128. URS Individual Proposal #13 - Q1. How feasible would it be to enforce this Proposal should it be implemented?

URS Individual Proposal #15

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/8iGJBw Note:

URS Individual Proposal #15 has specific questions below seeking public comment.

129. Please choose one of the following responses for URS Individual Proposal #15:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

130. If you wish to (a) propose changes to URS Individual Proposal #15; and/or (b) provide a rationale for your response, please do so here.

N/A

131. URS Individual Proposal #15 - Q1. Is the proposed definition of "repeat offender" in this Proposal appropriate?

Mark only one oval.

- ′e
-
- lo
- No opinion
-)ther:

132. URS Individual Proposal #15 - Q2. Is the proposed definition of "high-volume cybersquatting" in this Proposal appropriate?

Mark only one oval.

- ′e
-
- lo
- No opinion
-)ther:

133. URS Individual Proposal #15 - Q3. How feasible would it be to implement this Proposal?

N/A

URS Individual Proposal #16

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/9CGJBw Note:

URS Individual Proposal #16 has a specific question below seeking public comment.

N/A

135. If you wish to (a) propose changes to URS Individual Proposal #16; and/or (b) provide a rationale for your response, please do so here.

N/A

136. URS Individual Proposal #16 - Q1. How feasible would it be to implement this Proposal?

N/A

URS Individual Proposal #22

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/gSCJBw Note:

URS Individual Proposal #22 has specific questions below seeking public comment.

N/A

138. If you wish to (a) propose changes to URS Individual Proposal #22; and/or (b) provide a rationale for your response, please do so here.

N/A

139. URS Individual Proposal #22 - Q1. Is a "loser pays" model appropriate for the URS?

Mark only one oval.

- ′e
-
- lo
- No opinion
-)ther:

N/A

140. URS Individual Proposal #22 - Q2. Please provide input on the definition of specific criteria mentioned in this Proposal (e.g., “repeat offender” over a defined time period, and “high-volume cybersquatting”).

N/A

141. URS Individual Proposal #22 - Q3. Please provide input on the specific item(s) that should be paid in a “loser pays” model (e.g., administrative fees, attorneys’ fees).

N/A

142. URS Individual Proposal #22 - Q4. Please provide input on the enforcement mechanism of the proposed "loser pays" model.

N/A

URS Individual Proposal #26

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/9iGJBw

N/A

143. Please choose one of the following responses for URS Individual Proposal #26:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

144. If you wish to (a) propose changes to URS Individual Proposal #26; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #27

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/_CGJBw

145. Please choose one of the following responses for URS Individual Proposal #27:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

146. If you wish to (a) propose changes to URS Individual Proposal #27; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #28

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/_iGJBw Note:

URS Individual Proposal #28 has specific questions below seeking public comment.

147. Please choose one of the following responses for URS Individual Proposal #28:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

148. If you wish to (a) propose changes to URS Individual Proposal #28; and/or (b) provide a rationale for your response, please do so here.

N/A

149. URS Individual Proposal #28 - Q1. Please provide input on the suggested elements of the proposed “Panelist Conflict of Interest Policy”, should it be developed by the Working Group and applied to all URS Providers.

N/A

150. URS Individual Proposal #28 - Q2. Please list existing conflict of interest policies that can serve as examples for the proposed "Panelist Conflict of Interest Policy".

N/A

URS Individual Proposal #29

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/-CGJBw Note:

URS Individual Proposal #29 has a specific question below seeking public comment.

151. Please choose one of the following responses for URS Individual Proposal #29:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

152. If you wish to (a) propose changes to URS Individual Proposal #29; and/or (b) provide a rationale for your response, please do so here.

N/A

153. URS Individual Proposal #29 - Q1. What are the cost and benefits of implementing the Proposal?

N/A

URS Individual Proposal #31

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/-iGJBw

Note: URS Individual Proposal #31 stems from one of the general overarching Charter questions -- "General Overarching Charter Question #2: 2a. Should any of the New gTLD Program RPMs (such as the URS), like the UDRP, be Consensus Policies applicable to all gTLDs? 2b. If so, what are the transitional issues that would have to be dealt with as a consequence?"

Commenters have an opportunity to provide input on this general overarching Charter question in Section 10 of this form.

154. If you wish to provide (a) a response to URS Individual Proposal #31; and/or (b) a rationale for your response, please do so here.

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/ACKJBw Note:

URS Individual Proposal #33 has a specific question below seeking public comment.

155. Please choose one of the following responses for URS Individual Proposal #33:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

156. If you wish to (a) propose changes to URS Individual Proposal #33; and/or (b) provide a rationale for your response, please do so here.

N/A

157. URS Individual Proposal #33 - Q1. What additional elements, if any, that need to be included to enhance ICANN's Memorandums of Understanding (MOUs) with URS Providers and enforce their compliance?

N/A

URS Individual Proposal #34

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/AiKJBw

158. Please choose one of the following responses for URS Individual Proposal #34:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

159. If you wish to (a) propose changes to URS Individual Proposal #34; and/or (b) provide a rationale for your response, please do so here.

N/A

URS Individual Proposal #36

Please find link to this Individual Proposal and its context here: https://community.icann.org/x/BCKJBw

160. Please choose one of the following responses for URS Individual Proposal #36:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

161. If you wish to (a) propose changes to URS Individual Proposal #36; and/or (b) provide a rationale for your response, please do so here.

N/A

Save Your Progress

162. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- ☐ Yes
- ☐ No, I wish to continue to the next section

Section 9: TMCH Individual Proposals (Non- Recommendations)

- This section seeks to obtain input on all the individual proposals related to the Trademark Clearinghouse (TMCH). These proposals were submitted by individual working group members but did not rise to the level of becoming preliminary recommendations.
- Please note that some Individual Proposals contain associated questions that the Working Group specifically invites public comment.

TMCH Individual Proposal #1

Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/eCCJBw Note:

TMCH Individual Proposal #1 has specific questions below seeking public comment.

163. Please choose one of the following responses for TMCH Individual Proposal #1:

Mark only one oval.

- upport Proposal as written
- upport Proposal concept with minor change
- ignificant change required
- o not support Proposal
- lo opinion

164. If you wish to (a) propose changes to TMCH Individual Proposal #1; and/or (b) provide a rationale for your response, please do so here.

N/A

165. TMCH Individual Proposal #1 - Q1. Should education about the TMCH and its services be provided?

Mark only one oval.

- e
-
- lo

No Opinion

- ther:

166. TMCH Individual Proposal #1 - Q2. If there should be education about the TMCH and its services, how and by whom should such education be provided?

N/A

TMCH Individual Proposal #2 (1 of 2 proposals concerning design marks)

Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/eyCJBw Note:

TMCH Individual Proposals #2 & #3 have a specific question seeking public comment below.

167. Please choose one of the following responses for TMCH Individual Proposal #2:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

168. If you wish to (a) propose changes to TMCH Individual Proposal #2; and/or (b) provide a rationale for your response, please do so here.

N/A

TMCH Individual Proposal #3 (2 of 2 proposals concerning design marks)

Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/eyCJBw Note:

TMCH Individual Proposals #2 & #3 have a specific question seeking public comment below.

169. Please choose one of the following responses for TMCH Individual Proposal #3:

Mark only one oval.

- Support Proposal as written
- Support Proposal concept with minor change
- Significant change required
- Do not support Proposal
- No opinion

170. If you wish to (a) propose changes to TMCH Individual Proposal #3; and/or (b) provide a rationale for your response, please do so here.

N/A

171. TMCH Individual Proposals #2 & #3 - Q1. Do you have suggestions for ways to reconcile TMCH Individual Proposals #2 and #3?

N/A

TMCH Individual Proposal #4 (1 of 2 proposals concerning geographical indications)
Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/CSKJBw Note:

TMCH Individual Proposals #4 & #5 have a specific question seeking public comment below.

172. Please choose one of the following responses for TMCH Individual Proposal #4:

Mark only one oval.

- [ ] upport Proposal as written
- [ ] upport Proposal concept with minor change
- [ ] ignificant change required
- [ ] o not support Proposal
- [ ] lo opinion

173. If you wish to (a) propose changes to TMCH Individual Proposal #4; and/or (b) provide a rationale for your response, please do so here.

N/A

TMCH Individual Proposal #5 (2 of 2 proposals concerning geographical indications)
Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/CSKJBw Note:

TMCH Individual Proposals #4 & #5 have a specific question seeking public comment below.

N/A

175. If you wish to (a) propose changes to TMCH Individual Proposal #5; and/or (b) provide a rationale for your response, please do so here.

N/A

176. TMCH Individual Proposals #4 & #5 - Q1. Do you have suggestions for ways to reconcile TMCH Individual Proposals #4 and #5?

N/A

TMCH Individual Proposal #6

Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/CyKJBw

N/A

178. If you wish to (a) propose changes to TMCH Individual Proposal #6; and/or (b) provide a rationale for your response, please do so here.

N/A

TMCH Individual Proposal #7

Please find the link to this Individual Proposal and its context here: https://community.icann.org/x/DiKJBw

179. Please choose one of the following responses for TMCH Individual Proposal #7:

Mark only one oval.

- upport Proposal as written
- upport Proposal concept with minor change
- ignificant change required
- o not support Proposal
- lo opinion

180. If you wish to (a) propose changes to TMCH Individual Proposal #7; and/or (b) provide a rationale for your response, please do so here.

N/A

Save Your Progress

181. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- Yes
- No, I wish to continue to the next section

Section 10: Overarching Charter Questions

- The Working Group's Charter includes several general, overarching questions as well as a number of additional questions that the Working Group is expected to address at the conclusion of Phase 1 or Phase 2 of its work, as appropriate.
- The Working Group invites community input on three (3) general and three (3) additional overarching Charter questions, which may help inform the Working Group's overall work toward the Final Report.

182. General Overarching Charter #Q1. Do the RPMs collectively fulfil the objectives for their creation, namely “to provide trademark holders with either preventative or curative protections against cybersquatting and other abusive uses of their legally-recognized trademarks? In other words, have all the RPMs, in the aggregate, been sufficient to meet their objectives or do new or additional mechanisms, or changes to existing RPMs, need to be developed?

Overall, the RPMs have been sufficient to meet their objectives. We see no need for new or additional mechanisms, or changes beyond those proposed by the Working Group. Our primary concern is with preventing various forms of DNS Abuse, and with improving consumer trust and safety on the Internet.

183. General Overarching Charter #Q2a. Should any of the New gTLD Program RPMs (such as the URS), like the UDRP, be Consensus Policies applicable to all gTLDs?

N/A

184. General Overarching Charter #Q2b. If so, what are the transitional issues that would have to be dealt with as a consequence?

Addition of URS (which is largely complete) to all legacy gTLDs would not raise any significant transitional issues.

185. General Overarching Charter #Q3a. Will changes to one RPM need to be offset by concomitant changes to the others?

N/A

186. General Overarching Charter #Q3b. If so, to what extent?

N/A

187. Additional Overarching Charter #Q1. Do the RPMs adequately address issues of registrant protection (such as freedom of expression and fair use)?

N/A

188. Additional Overarching Charter #Q2. Is the recent and strong ICANN work seeking to understand and incorporate Human Rights into the policy considerations of ICANN relevant to the UDRP or any of the RPMs?

As a general matter, incorporating Human Rights consideration into ICANN policy development is relevant to all ICANN policies, including RPMs. The question of how that should be taken into account, both generally and with regard to any or all RPMs, is beyond the scope of these responses and deserving of a process unto itself

189. Additional Overarching Charter #Q3. How can costs be lowered so end users can easily access RPMs?

While this is phrased as a general "end user" question, it is primarily relevant to end users with trademarks – individuals, businesses, non-profits, bands, etc. Many individuals and smaller businesses, as well as brand-owners in developing economies, have the same concerns as larger or better-financed trademark holders but may not have the experience and wherewithal to make use of the RPMs. There could be financial supports or subsidies to open the RPMs to these end-users. Beyond that, there are also non-financial supports that have the effect of lowering costs for these end-users, some of which are discussed in the Recommendations. These include increasing offerings of translations,translation services, educational materials, model submissions, helplines or chats, and even pro bono legal representation.

Save Your Progress

190. Do you want to save your progress and quit for now? You will be able to return to the form to complete at a later time.

Mark only one oval.

- Yes
- No, I wish to continue to the next section

Section 11: Other Comments & Submission

191. Are there any additional recommendations that you believe the Working Group should consider making? If yes, please provide details below.

N/A

192. Are there any other comments or issues you would like to raise pertaining to the Initial Report? If yes, please enter your comments here. If applicable, please specify the section or page number in the Initial Report to which your comments refer.

N/A