



Dated: 1 June 2021

APRALO Statement on Subsequent Procedures Final Outputs

The ICANN Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) thanks the ICANN Board for inviting comments to the GNSO New gTLD Subsequent Procedures Final Outputs¹ and is pleased to provide some comments for the Board's consideration.

First and foremost, APRALO wishes to inform the ICANN Board that it fully endorses the ratified ALAC Advice on Subsequent Procedures of 16 April 2021 (AL-ALAC-ST-0421-02-01-EN)² and notes that the Board has received this ALAC Advice.

Further and in particular, APRALO wishes to raise the following positions either in support of and/or in supplement to the said ALAC Advice.

1. Need to facilitate increased adoption of Universal Acceptance (UA) & Internationalized Domain Names (IDNs)

As the largest ICANN region spanning the most widespread of nations and therefore also the most diverse of regions in terms of thriving languages, dialects and scripts (i.e. languages in written form), the APRALO maintains a special interest in advocating for ICANN consensus policies which will advance the goals of the Universal Acceptance Initiative (UAI) and which will stimulate the introduction of more Internationalized Domain Names (IDNs) at both the top and second levels. We believe both the UAI and introduction of IDN TLDs and SLDs are crucial to efforts to connect to the Internet, the hundreds of millions of Internet end-users who rely on non-Roman script languages for their communications.

We note that the Subsequent Procedures Topic 11 Final Outputs continue to support the UAI and the work of the Universal Acceptance Steering Group (UASG), but do not explicitly provide policy goals that advances the UAI for ICANN Org's implementation per se. We understand and acknowledge that this "gap" can and in many ways, would be better addressed through the ICANN Board's direct support for the UAI as well as ICANN Org's efforts complementary to those undertaken by the UASG. In this respect, APRALO implores the ICANN Board to ensure this happens.

Although disappointed by the lack of Final Outputs to affirmatively prioritize applications for IDNs in the next round, we welcome the inclusion of a Topic 19 Final Output (i.e. Recommendation 19.3) which seeks to somewhat prioritize the processing of applications for IDNs in Subsequent Procedures. To give context from an At-Large perspective in general and as identified by community need for IDN's in the APAC space in TLDs including new Generic Top Level names in any subsequent rounds, APRALO specifically notes that, just as with the ALAC/At-Large comments to the last round of new gTLDs, a prioritisation should be given to IDNs in all outreach and engagement regarding any program(s) as well as preference/ prioritisation to successful applicants proposing IDNs.

¹ This Public Comment Process is found at <https://www.icann.org/public-comments/gnso-gtld-subsequent-procedures-final-outputs-2021-04-22-en>

² The ALAC Advice on Subsequent Procedures is published at https://atlarge.icann.org/advice_statements/13823

2. Need to facilitate increased and equitable access by “Global South”, community / niche TLD applicants through the Applicant Support Program (ASP) & Community Priority Evaluation (CPE) and a ban on private auctions

There were only 303 of 1,930 applications from the Asia Pacific region during the 2012 New gTLD application round³ which translates to less than 16% of the total number of applications received by ICANN then. Any endeavour which could assist in staving off a repeat of such a hugely disproportionate result for the next round should be encouraged considering that Asia and Oceania together now roughly account for over 55% of the world’s population which in turn comprises about 54% of the world’s Internet users.⁴

APRALO notes that ICANN Org is continuing its work on reframing or defining the term “Global South” for purposes, perhaps, of prioritizing or making some concessions for more effective outreach to potential “Global South” applicants in anticipation of the next round of New gTLD applications. Regardless, we believe that any outreach efforts and communication period must be more than sufficiently resourced and long enough to facilitate the necessary awareness, education and preparedness to achieve a significant increase in applications from the “Global South” in the next round and beyond.

In addition, we think the ICANN Board should neither underestimate the impact which the Applicant Support Program (ASP) will have on encouraging more potential New gTLD applicants from our region, nor the clear risk of gaming of the New gTLD Program for profit if private auctions were permissible as a means to resolve contention sets in Subsequent Procedures. In particular, we think that the ASP and Community Priority Evaluation (CPE) will have an important role in not only increasing the number of applications from our region, but also improving their chances of securing the strings of their choice, including and especially ones vying for community and/or niche TLDs.

As our specific comments on ASP, CPE and for private auctions to be banned are all similarly presented and grounded in the mentioned ALAC Advice on Subsequent Procedures, we will not repeat them herein and instead, we urge the Board to heed to the ALAC’s counsel in the said ALAC Advice.

3. Need for ALAC to have automatic standing to file Community Objections (where ALAC deems necessary)

In reviewing the 2012 round applications for strings with a public and/or community interest angle, the ALAC had established a robust bottom-up evaluation process which involved all five Regional At-Large Organizations (RALOs) and having been funded by ICANN Org, the ALAC filed Community Objections against applications earmarked through that RALO-driven process. There is no reason to presuppose that the same or a similar bottom-up approach will not be replicated to support the ALAC’s responsibility to highlight and object to problematic future applications for New gTLDs. In fact, it is clear that the ALAC (along with the Independent Objector) will continue to be funded to file Community Objections (and Limited Public Interest Objections) in Subsequent Procedures. However, APRALO is concerned over the inherent possibility that any Community Objection which the ALAC determines to file under Subsequent Procedures may be dismissed by a Community Objection dispute resolution panelist on the basis of a lack of standing. A dismissal on the basis of lack of standing precludes a consideration of the merits of an objection and would amount to a waste of the resources (which would be) expended in getting the objection filed. Therefore, we wholly support the ALAC’s recommendation for the ALAC to be granted automatic standing to file Community Objections in future rounds of the New gTLD Program.

³ See: <https://newgtlds.icann.org/en/program-status/statistics>

⁴ See: <https://www.internetworldstats.com/stats.htm>