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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on Proposed Amendment 1 to the .JOBS Registry Agreement

Introduction

On 30 September 2020, Public Comment opened for [Proposed Amendment 1 to the .JOBS Registry Agreement](#). 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, and Marita Moll and Gregory Shatan, ALAC Members of the North American Regional At-Large Organization (NARALO), volunteered for the drafting team of the ALAC statement.

On [11 November 2020](#), Gregory Shatan and Marita Moll discussed with the CPWG on points of consensus. The CPWG provided input on the At-Large points of consensus, and a draft statement was developed.

On 16 November 2020, a request for extension to submit the ALAC statement on 18 November 2020 was granted by [ICANN staff responsible for the ICANN Public Comment proceeding](#).

On 16 November 2020, Marita Moll and Gregory Shatan shared the first draft of the ALAC statement on a Google Doc. ICANN Policy staff in support of the At-Large community [posted the draft to its workspace](#) and issued a call for comments to the CPWG. Justine Chew, ALAC Member of the Asian, Australasian, and Pacific Islands Regional At-Large Organization (APRALO) added comments to the ALAC statement.

On [18 November 2020](#), the CPWG discussed the ALAC statement, including any final comments from the CPWG members. The CPWG finalized the ALAC statement and recommended it be submitted to ICANN Public Comment.

On 18 November 2020, Marita Moll, Justine Chew and Gregory Shatan finalized the ALAC statement.

On 18 November 2020, the ALAC Chair, Maureen Hilyard, requested that the statement be ratified by the ALAC and submitted to ICANN Public Comment.

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At-Large is happy to have this opportunity to comment on proposed modifications to the .JOBS registry agreement. We are also grateful for a brief extension. The lengthy preparations and duration of the virtual AGM did take a lot of energy which we are still recouping.

The ALAC hereby registers concerns about the requested amendments to the .JOBS Registry Agreement with Employ Media which would remove the non-profit Society for Human Resource Management (SHRM) as sponsor and make Employ Media the sponsor of the .JOBS TLD in the absence of any clear rationale. Given that .JOBS is a legacy sponsored TLD, which has functioned as a community TLD, we do not feel that removing SHRM would serve the public interest. Although the proposed amendment proposes to preserve the HR Council, we wonder who would provide the oversight on the proposed commitment of Employ Media to ensure that this Council "functions independently to serve the needs and act in the interest of the .JOBS TLD community" -- currently a responsibility of SHRM, an entity that would appear much better suited to hold the such responsibility..The proposed changes also reduce restrictions on registrant eligibility, which changes the essential nature of this sponsored TLD. Finally, it appears that the HR Council, which was once a policy development body and a voice of the community, has been reduced to an advisory role, which may turn out to be largely ceremonial.

We see that this proposal is a result of a bilateral agreement between Employ Media and ICANN.org. In this situation, ICANN needs to be the guardian of the interests of other stakeholders, not least the billions of end-users. We would like to point out that the end-user community places a very high value on the role of non-profits as stewards of TLDs, as was evident in the recent controversy over a proposed sale of PIR. In this proposal, the non-profit organization is removed as sponsor without any additional checks and balances on the new sponsor/registrar. We do not see how ICANN.org proposes to ensure that this change will "not result in a departure from or a drastic change to the TLD Sponsor's role, obligations, and commitments to the sponsored TLD Community or negative impact to the sponsored TLD Community" as stated in the proposed amendment. Instead, it appears that Employ Media is largely left to police itself, particularly since ICANN has agreed not to pursue certain types of claims against Employ Media.

ALAC believes that it would be in the best interests of end-users to maintain more robust oversight provision on behalf of the .jobs community, and ultimately the end-user community. Failing that, ICANN must exercise active oversight and compliance monitoring to ensure that this TLD maintains what is left of its governance structure as more than window dressing.