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**AL-ALAC-ST-0823-01-00-EN**  
**ORIGINAL: English**  
**DATE: 12 September 2023**  
**STATUS: Ratified**

### AT-LARGE ADVISORY COMMITTEE

**Comment on:**

**GNSO Guidance Process Applicant Support Guidance Recommendation Initial Report.**

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The ALAC is pleased to submit to the Public Comment regarding the GNSO Councils GGP for Applicant Support Guidance Recommendation Initial Report the views and feedback from the ALACs Consolidated Policy Working Group was sort, received and [endorsed by the ALAC](#) on <insert date>.

### Executive Summary:

The ALAC/At-Large is, in general, able to support the intent of the proposed recommendations on Applicant Support Guidance as currently worded by the GGP or with some altered wording; there were 2 recommendations that fell below a 75% of respondents (N=37) 'Support the Recommendation as written' mark:-

**4. APPLICATION SUBMISSION AND EVALUATION; Guidance Recommendation 4:** *Make application materials and the application process timely and accessible to diverse potential applicants, with the aim of facilitating successful applications in the Applicant Support Program among those who may need and could qualify for support*

and

**5. CONTRACTING/DELEGATION; Guidance Recommendation 5:** *Of all successfully delegated gTLD applications, the goal is that a certain percentage of them should be from supported applicants.*

However as the detailed polling results ([see following section](#)) show, for recommendation 4, the support for 'Support Recommendation intent with wording change' when added to the 'Support the Recommendation as written' indicates support for the intent at a level of 83.8% of

respondents. The value of the same bundled support for the intent of the recommendation for recommendation 5 is a lower value of 78.6% with the highest number of respondents stating 'Significant change required: changing intent and wording' at 13.5%. Of the 37 respondents 2 or 3 indicated 'Do not support Recommendation' to all 9 recommendations.

## Methodology:

Structured questions were provided as part of the Public Comment by the GGP Team and each were reviewed, discussed and polled within the At-Large Advisory Committee's (ALAC's) Consolidated Policy Working Group (CPWG); A survey including the choice options for each recommendation as per the PC feedback form was sent to all members of the CPWG and 37 responses were received by the deadline of August 25. This data has then been used to provide the information, interpretations charts and any proposed wording changes and rationales for all the responses as a group, as listed below:

## Results:

When the polling is sorted into respondents who support the intent of the recommendations without or with some wording changes and those who would desire 'Significant change required: changing intent and wording.' we see the following overall opinion spread.

'Support the Recommendation as written + 'Support Recommendation intent with wording change'	'Significant change required: changing intent and wording'	'Do not support Recommendation'
Rec 1: 81.1 + 5.4% = <b>86.5%</b>	5.4% (n=2)	8.1% (n=3)
Rec 2: 83.8 + 2.7 = <b>87.5%</b>	8.1% (n=3)	5.4% (n=2)
Rec 3: 75.7 + 8.1 = <b>83.8%</b>	10.8% (n=4)	5.4% (n=2)
Rec 4: 70.3 + 13.5 = <b>83.8%</b>	8.1% (n=3)	8.1% (n=3)
Rec 5: 67.8 + 10.8 = <b>78.6%</b>	13.5% (n=5)	8.1% (n=3)
Rec 6: 78.4 + 8.1 = <b>86.5%</b>	5.4% (n=2)	8.1% (n=3)
Rec 7: 75.7 + 8.1 = <b>83.8%</b>	10.8% (n=4)	5.4% (n=2)
Rec 8: 78.4 + 5.4 = <b>83.8%</b>	10.8% (n=4)	5.4% (n=2)
Rec 9: 78.4 + 10.8 = <b>89.2%</b>	5.4% (n=2)	5.4% (n=2)

# Detailed Polling Results

## Preliminary Guidance Recommendations Relating to Tasks 3, 4, and 5

Guidance Recommendation 1: Please refer to page 11 of the [Initial Report](#).

“...the working group gradually distilled the goals into one goal/recommendation guidance per life-cycle element as seen below. This consolidation of the goals made it simpler to identify the related indicators of success and metrics.

### LIFE CYCLE ELEMENTS:

#### 1. COMMUNICATIONS And OUTREACH/AWARENESS

##### Guidance Recommendation 1:

Increase awareness of the Applicant Support Program of the next round of gTLD applications among those who may need and could qualify for support. Implementation Guidance: Target potential applicants from the not-for-profit sector, social enterprises and/or community organizations from under-served and developing regions and countries.

##### Indicators of Success:

**Quantitative:** Conversion rates proportionate with industry standards for online campaigns and in-person events, with specific metrics and pre-agreed to be determined in consultation with ICANN org Communications and applicable contractor(s).

**Qualitative:** Survey results about quality and clarity of information that are proportionate with industry standards, with specific metrics to be determined and pre-agreed in consultation with ICANN org Communications and applicable contractor(s).

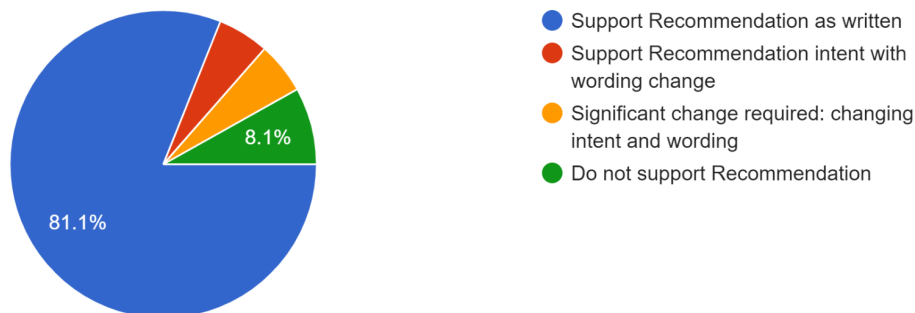
**Data/Metrics to Measure Success:** Click-throughs, inquiries, registrations to get more information, etc.

**Qualitative Measurements:** Results of the surveys about the quality of the information provided – whether the recipient understood the information, made an informed decision to consider pursuing further or walk away.”

## Poll result

Please indicate your response to Guidance Recommendation 1 - Outreach

37 responses



81.1% Support Recommendation as written.  
5.4% Support Recommendation intent with wording change.  
5.4% Significant change required: changing intent and wording.  
8.1% Do not support Recommendation

## Guidance Recommendation 2: Please refer to page 14 of the [Initial Report](#).

“...ICANN org suggested that they could seek guidance from the ICANN’s Global Communications Team to get input on how to frame this metric appropriately for the context. The working group cautioned against putting too much detail into the recommendation to avoid restricting the development of the program.

### 2. "BUSINESS CASE" ALSO KNOWN AS APPLICANT UNDERSTANDING AND DETERMINING NEED/OPPORTUNITY AND DEVELOPING APPLICATION

**Guidance Recommendation 2:** That the Applicant Support Program has cultivated pro bono services as well as ICANN-provided information and services to be available for supported applicants to inform their gTLD applications; that ICANN will communicate the availability of pro bono services and the parameters in which they are offered to potential supported applicants; and that supported applicants report that they found the information and services offered by pro bono providers to be useful.

#### Indicators of Success:

**Quantitative:** A majority of Applicant Support Program applicants that access pro bono services indicate moderate to high satisfaction with those pro bono services and information.

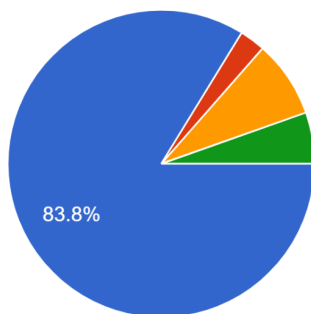
**Qualitative:** A majority of Applicant Support Program applicants that are surveyed about quality and usefulness of services, such as pro bono services, indicate how and why those services were useful to their application.

**Data/Metrics to Measure Success:** A majority of respondents that are surveyed about pro bono services indicated that the services and information that they received was useful to informing their gTLD application and/or assisting them through the application process.”

### Poll result

Please indicate your response to Guidance Recommendation 2 - Business Case

37 responses



- Support Recommendation as written
- Support Recommendation intent with wording change
- Significant change required: changing intent and wording
- Do not support Recommendation

83.8% Support Recommendation as written  
2.7% Support Recommendation intent with wording change  
8.1% Significant change required: changing intent and wording.  
5.4% Do not support Recommendation

### Guidance Recommendation 3: Please refer to page 16 of the [Initial Report](#).

“...The working group members agreed to clarify the language in the guidance recommendation that ICANN will communicate the availability of pro bono services and the parameters in which they are offered to potential supported applicants.

#### 3. ICANN ORG SET UP OF APPLICANT SUPPORT PROGRAM FOR SUCCESS (IN OPERATIONAL TERMS)

**Guidance Recommendation 3:** That the Applicant Support Program has the necessary resources to achieve its goals based on the GGP Guidance Recommendation Report. Indicators of Success:

**Qualitative:** Survey results from event attendees, potential Applicant Support Program applicants, and actual Applicant Support Program applicants indicate a high degree of understanding about the Applicant Support Program and the gTLD Program application requirements.

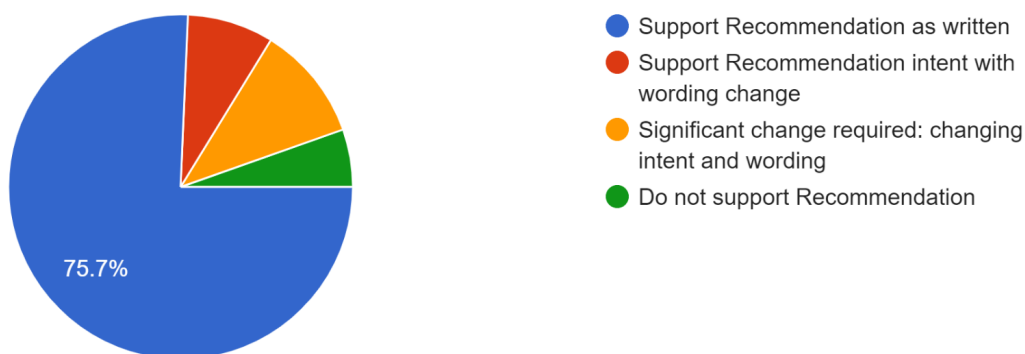
**Data/Metrics to Measure Success:** “mentions”, the quality of the coverage (e.g., reach, correct messaging, positive tone, appropriate outlet), and the geographic distribution of the coverage. Additional communications metrics that can be considered include social media statistics, website traffic, and event attendance (physical and online), inquiries, event registrations indicate awareness and have cultivated interest among potential applicants to get more information about the Applicant Support Program.

**Qualitative Measurements:** Results of the ongoing surveys about the quality, accessibility, and usefulness of the information and events provided about the Applicant Support Program.”

### Poll result

Please indicate your response to Guidance Recommendation 3 - Resources

37 responses



75.7% Support Recommendation as written  
8.1% Support Recommendation intent with wording change  
10.8% Significant change required: changing intent and wording.  
5.4% Do not support Recommendation.

## Guidance Recommendation 4: Please refer to page 17 of the [Initial Report](#).

“...The working group further agreed to make a minor adjustment to the language to clarify that there needs to be surveying throughout the process as every applicant is going to be able to make a decision about progressing at different stages.

### 4. APPLICATION SUBMISSION AND EVALUATION

**Guidance Recommendation 4:** Make application materials and the application process timely and accessible to diverse potential applicants, with the aim of facilitating successful applications in the Applicant Support Program among those who may need and could qualify for support.

**Indicators of Success:** ICANN Learn module/survey results show that a majority of applicants had a strong understanding of the application requirements and evaluation process.

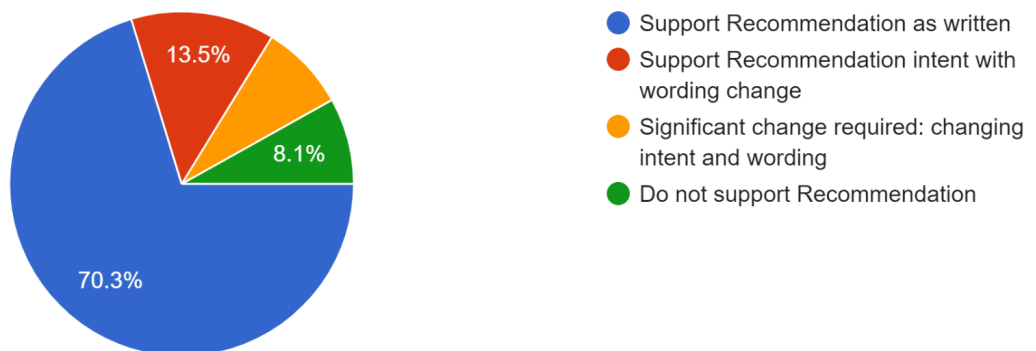
**Data/Metrics to Measure Success:** Percentage of applicants that applied that indicated via survey or ICANN Learn module that they had a strong understanding of the ASP application requirements and evaluation process.

**Qualitative Measurements:** Results of surveys about whether the applicant was successful or made an informed decision not to submit an application (noting that survey response rates from entities that ultimately chose not to submit an application may be quite low and difficult to measure).”

## Poll result

Please indicate your response to Guidance Recommendation 4 - Application

37 responses



70.3% Support Recommendation as written  
13.5% Support Recommendation intent with wording change  
8.1% Significant change required: changing intent and wording.  
8.1% Do not support Recommendation.

## Guidance Recommendation 5: Please refer to pages 18–19 of the [Initial Report](#).

“... working group members generally agreed that this was out of scope of the working group’s tasks.

### 5. CONTRACTING/DELEGATION

**Guidance Recommendation 5:** *Of all successfully delegated gTLD applications, the goal is that a certain percentage of them should be from supported applicants.*

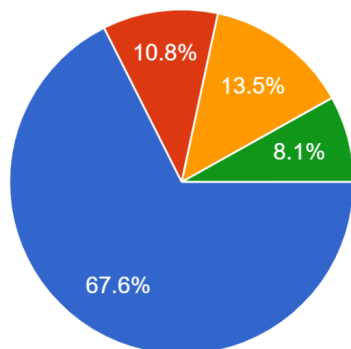
**Indicators of Success:** *No fewer than 10, or 0.5 percent (.005), of all successfully delegated gTLD applications were from supported applicants.*

**Data/Metrics to Measure Success:** *0.5 percent (.005) of successfully delegated gTLD applications are from supported applicants. Note that this percentage is not in relation to the number of strings applied for, rather the number of applications.”*

## Poll result

Please indicate your response to Guidance Recommendation 5 - Delegation

37 responses



- Support Recommendation as written
- Support Recommendation intent with wording change
- Significant change required: changing intent and wording
- Do not support Recommendation

67.8% Support Recommendation as written  
10.8% Recommendation intent with wording change  
13.5% Significant change required: changing intent and wording.  
8.1% Do not support Recommendation.

## Guidance Recommendation 6: Please refer to page 20 of the [Initial Report](#).

“... They also agreed that when considering the methodology for allocating scarce funding (Task 6) it would be fairer to assume that one string equaled one application, and so one application per supported applicant.

### 6. ONGOING OPERATIONS OF THE GTLD

**Guidance Recommendation 6:** *ICANN org to investigate the extent to which supported applicants that were awarded a gTLD are still in business as a registry operator after three years.*

**Implementation Guidance:**

1. If supported applicants that were awarded a gTLD are not still in business as a registry operator after three years, ICANN org should investigate barriers/challenges that failed registry operators experienced to help inform future aspects of Applicant Support Program and/or other capacity development new registry program.

2. Following completion of a new gTLD round, ICANN org should collect data on the number of supported applications that resulted in a delegated TLD by region, and those that did not; track operations of those delegated TLDs for three years; and conduct of survey of the successful and unsuccessful supported applicants to determine which elements of the program they found useful or not.

**Indicators of Success:** Number of supported applications that result in a delegated TLD and track operations over a designated time period, for example three years.

**Data/Metrics to Measure Success:**

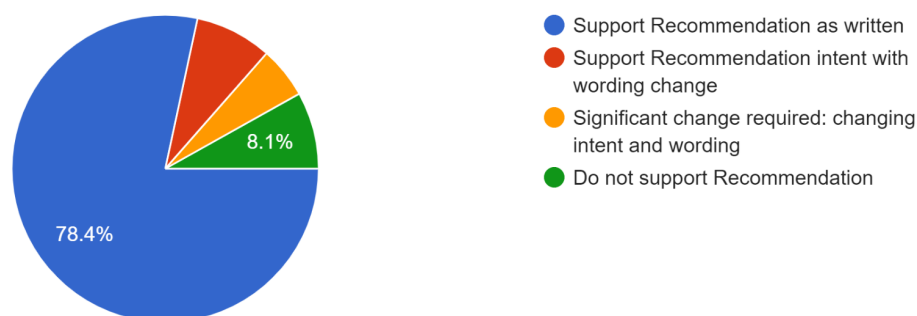
- The number of registrants of domain names registered in “regional” TLDs (e.g., TLDs focusing mainly on a local, limited market), keeping in mind that there are other barriers for registrants in developing countries to access domain names, such as inability to access online payment services and a lack of local registrars.
- The number of domain names registered in “regional” new gTLDs compared to the number of Internet users in such regions. These numbers could be compared with the same numbers for Internet users and “regional” new gTLDs in developed regions such as Europe and North America.

**Guidance Recommendation 6:** ICANN org to investigate the extent to which supported applicants that were awarded a gTLD are still in business as a registry operator after three years.

**Poll result**

Please indicate your response to Guidance Recommendation 6 - Ongoing Ops

37 responses



78.4% Support Recommendation as written  
8.1% Support Recommendation intent with wording change  
5.4% Significant change required: changing intent and wording.  
8.1% Do not support Recommendation.



## Preliminary Guidance Recommendations Relating to Task 6 cont...

### Guidance Recommendation 7: Please refer to page 23 of the [Initial Report](#).

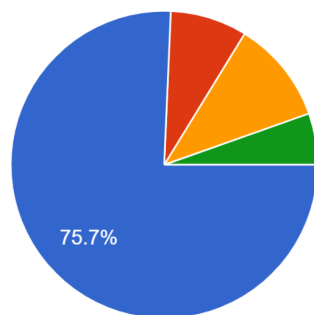
“... the ODA does not address Task 6 per se, in that it envisions the availability of additional funding (not that there is inadequate funding) should such funding be needed (that is, via an additional budget allocation and/or sponsorship). In addressing Task 6, the WG might want to account for a scenario where additional funding is not available.

**Guidance Recommendation 7:** *In the scenario that there is inadequate funding for all qualified applicants in the Applicant Support Program, the recommended methodology for allocating financial support should be for ICANN org to allocate limited funding by way of fee reduction equally across all qualified applicants, while not hindering the efficiency of the process. In this context the working group agreed to assume, for the sake of equity, that one application equaled one string. This recommendation is made in the context of no additional funding being made available. However, the group recommends that ICANN org give high priority to and make every effort to provide additional funding so that all successful applicants are supported.”*

### Poll result

Please indicate your response to Guidance Recommendation 7 - Funding

37 responses



- Support Recommendation as written
- Support Recommendation intent with wording change
- Significant change required: changing intent and wording
- Do not support Recommendation

**75.7% Support Recommendation as written**  
**8.1% Support Recommendation intent with wording change**  
**10.8% Significant change required: changing intent and wording.**  
**5.4% Do not support Recommendation.**

## Guidance Recommendation 8: Please refer to page 24 of the [Initial Report](#).

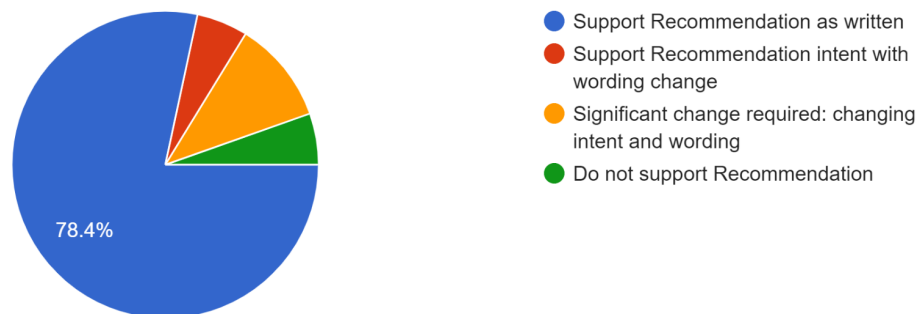
“... In its deliberations the working group identified a number of disadvantages. Specifically, the working group noted that prioritization would put ICANN org in the unfortunate position of having to select some qualified applicants over others for more or less funding based on criteria that would likely be questioned as subjective. Furthermore, in order to be able to recommend this option the working group would have to reach agreement on which factors should result in prioritization; consider criteria to evaluate applications; and ICANN org would have to set up an evaluation structure to carry out prioritization. The working group did not address these steps.

**Guidance Recommendation 8:** To mitigate the risk that the allocation of support under the Applicant Support Program could be diluted to the point of being unhelpful, ICANN org should designate a minimum level of support each qualified applicant must receive, and develop a plan if funding drops below that level.”

## Poll result

Please indicate your response to Guidance Recommendation 8 - Minimum support

37 responses



*78.4% Support Recommendation as written  
5.4% Support Recommendation intent with wording change  
10.8% Significant change required: changing intent and wording.  
5.4% Do not support Recommendation.*

## Guidance Recommendation 9: *Please refer to page 25 of the [Initial Report](#).*

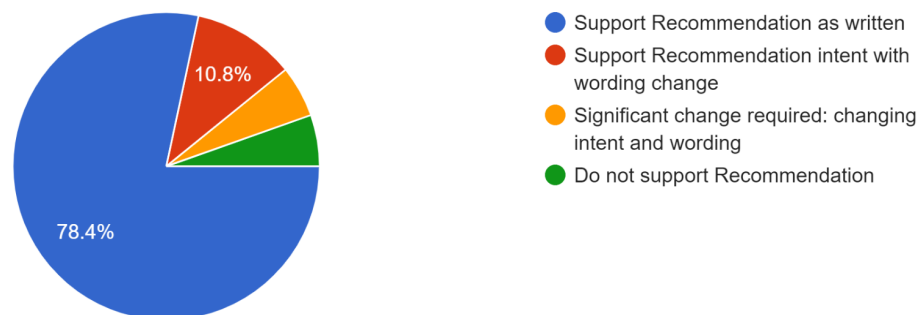
*“... ICANN org GDS staff agreed that the guidance recommendation as currently written was helpful because it establishes that there is a purpose and a goal behind the allocation of support.”*

**Guidance Recommendation 9:** *ICANN org should develop a flexible, predictable, and responsive Applicant Support Program in order to communicate the results of evaluation process and allow applicants to know their range of support allocations as early as possible in a transparent manner.”*

### Poll result

Please indicate your response to Guidance Recommendation 9 - Org responsiveness

37 responses



*78.4% Support Recommendation as written  
10.8% Support Recommendation intent with wording change  
5.4% Significant change required: changing intent and wording.  
5.4% Do not support Recommendation.*

### Conclusion

The bottom line is that the At-Large Community, and we believe the rest of the world, will judge the success of this round, almost entirely, on the expansion of the registry pool. The ICANN Board Chair, Tripti Sinha, has referred to this as the round of inclusion and we could not agree more. It cannot be imagined that the root any longer suffers from a lack of useful names. Instead, it suffers from a lack of economic, geographic, cultural and linguistic diversity.

As such, there are aspects here which are potentially troubling. First, the idea that, if there are too many applicants for support, the available funds should simply be divided amongst the applicants, flies in the face of diversity and inclusion as the objective. Instead the notion there ought to be a minimum level of support established (Rec 9), and backed up by ICANN, makes

more sense. All of these numbers are insignificant in the context of likely revenues from a new round. The At-Large Community agrees with the recommendation at the end of topic 7 that ICANN commit to expanding the funding pool, as necessary to provide sufficient support to all applicants (for support).

Furthermore, the issue of Business Case development might spill beyond the capacity of the pro bono program and instead require additional study to identify and document how various business models, from the previous round, have fared.

While the plans for an outreach program appear to be leaps and bounds beyond what took place in 2012, the At-Large Community believe that true inclusion will require a sustained, concerted effort, sufficient funding and a willingness to identify opportunities to help beyond a mere discount in fees. Again, this round will *only* be considered a success if the registry pool expands beyond the “usual suspects.”

#### Other comments:

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

It is brought to the GGP Teams attention that from amongst the respondents who indicated either Not in Favour or Not supportive of the Intent as written, only one set of comments intended to provide a rationale for this opinion was received. Please see the attached Appendix.

# Appendix

## Dissenting Input, Comments and Rationale from CPWG Member Christopher Wilkinson

The following comments refer to the questions relating to each recommendation:

- a) If you support the intent of this Guidance Recommendation but think it requires a wording change, please provide your revised wording and reason here. [open ended response, optional]
- b) If you do not support this Guidance Recommendation, please provide your reason here. [open ended response, optional]
- c) Are there any comments or issues you would like to raise pertaining to the Rationale for this Guidance Recommendation? If yes, please provide your comments here. [open ended response, optional]

### **Recommendation 1: Communication and Outreach/Awareness**

- (a) Regrettably, there is NO ICANN entity qualified or mandated to 'filter' such applications. Least of all GNSO itself, whose delegates to Sub-Pro and subsequently have unapologetically opposed expansion of Applicant Support.*
- (b) The procedure should begin with a serious budgetary target, say, 25% of the whole program.*

### **Recommendation 2: BUSINESS CASE" ALSO KNOWN AS APPLICANT UNDERSTANDING AND DETERMINING NEED/OPPORTUNITY AND DEVELOPING APPLICATION**

- (a) Pro bono support " needs to be explicitly defined, including financial costs, to be paid by ICANN. In this context pro bono support clearly failed in 2012. Why? What lessons have been learnt?*
- (b) Pro Bono support alone in the context of IDNs is quite unlikely to be available and to succeed.*

### **Recommendation 3: ICANN ORG SET UP OF APPLICANT SUPPORT PROGRAM FOR SUCCESS (IN OPERATIONAL TERMS)**

- (a) I question the motivation of the GGP Report:*
- (b) Understandably we do not have indicators of success. Rather the opposite.-*

### **Recommendation 4: APPLICATION SUBMISSION AND EVALUATION**

- (a) among those who may need and could qualify for support*
- (b) The text would give too much arbitrary power to the few individuals charged with making the selection.*

### **Recommendation 5: CONTRACTING/DELEGATION**

- (a) The text provides unknown and unaccountable powers to filter and reject applications*

- (b) *In 2012 the 'delegated gTLDs' were exaggerated by extraordinary numbers of EN portfolio applications many of which have subsequently failed.*
- (c) *Unless the continued threat of portfolio applications is under control, that is not a suitable 'base' from which to assess successful AP applications.*

**Recommendation 6: ONGOING OPERATIONS OF THE GTLD**

- (a) *This could usefully be extended to the 2012 decisions.*
- (b) *<The recommendation raises the general issue of poor statistical collection and reporting on ICANN's part.- There is apparently no branch of [ICANN.org](http://ICANN.org) [[icann.org](http://icann.org)] which is charged with economics and statistics of the industry.*

**Recommendation 7: In the scenario that there is inadequate funding for all qualified applicants in the Applicant Support Program, the recommended methodology for allocating financial support should be for ICANN org to allocate limited funding by way of fee reduction equally across all qualified applicants, while not hindering the efficiency of the process. In this context the working group agreed to assume, for the sake of equity, that one application equaled one string.**

- (a) *It is already well known that providing 'free reductions' alone is quite inadequate for financing TLD start-ups. The proposal would ensure that a too small amount of money would be wasted on failing projects.*

**Recommendation 8: To mitigate the risk that the allocation of support under the Applicant Support Program could be diluted to the point of being unhelpful, ICANN org should designate a minimum level of support each qualified applicant must receive, and develop a plan if funding drops below that level."**

- (a) *seems to somewhat contradictory with Recc. 7*
- (b) *Cannot evaluate the Recc. Without budgetary information.*
- (c) *The indications are that ICANN does not , and probably cannot, know what is the "minimum level of support" necessary for success.*
- (d) *Is it just a small reward for daring to apply but no more?*

**Recommendation 9: ICANN org should develop a flexible, predictable, and responsive Applicant Support Program in order to communicate the results of evaluation process and allow applicants to know their range of support allocations as early as possible in a transparent manner."**

- (a) *Promote Recc 8 to Recc. 1.*
- (b) *There is no reason why [ICANN.org](http://ICANN.org) [[icann.org](http://icann.org)] has not done this, several years ago*

## ALAC Endorsement Vote Details:

On 26 September 2023, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor, 0 votes against, and 0 abstentions. Please note 100 % of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Bill Jouris, Carlos Aguirre, Dave Kissoondoyal, Eduardo Diaz, Joanna Kulesza, Jonathan Zuck, Laura Margolis, Marcelo Rodriguez, Matthias Hudobnik, Maureen Hilyard, Naveed Bin Rais, Raihanath Gbadamassi, Raymond Mamattah, Satish Babu, Tommi Karttaavi. You may view the results here : <https://tally.icann.org/cgi/results?e=c0f9ea2aefe>