

Summary of Registration Policies for GAC Category 1 Highly Regulated Applications // ALAC WORKING VERSION // DRAFT - DO NOT DISTRIBUTE

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	String	Portfolio/Applicant	Application Stage / Status	Staff Summary of Commitments	ALAC Concerns (Cheryl Langdon-Orr)	ALAC Concerns (Alan Greenberg)	ALAC Concerns (Olivier Cr��pin-Leblond)	ALAC Concerns (Evan Leibovitch)	
1	abogado	Top Level Domain Holdings Limited	Contracted	Restricted registration policies; single point of contact for law enforcement.		Agree with Olivier	Abogado = lawyer. High concern for misuse. If restricted registration policies then OK	Agree with Olivier	
2	attorney	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		Some concern. Not sure on real impact. Will people really consult someone based on URL. Perhaps URL in combination with convincing web site.	High concern for misuse. How fast is abuse monitoring response?	For reasons that seem more intuitive than factual, this bothers me less than .LAWYER. The former is mainly a titular string than a professional/legal designation. Nobody ever attends "attorney school".	
3	bank	FTLD Registry Services LLC	Contracted	Registration limited to verified banks, savings associations, and associations, service providers, and government regulators serving the banking industry. Registrants must demonstrate that they are eligible members of the banking community (business charter, mission statement, etc.); banks must provide government regulatory authority and ID issued by this authority.		Community TLD. If Banking association satisfied, so am I	High concern for misuse. Excellent registration policies. How are these "locked" into contract?	Agree with Olivier. Green if the PICs look complete and enforceable.	
4	banque	GEXBAN SAS	Will Not Proceed						
5	BET	Afilias Limited	Pre Contract			Generic word and although clearly associated with gambling, not sure how one could reasonably restrict registration. But still, it is a concern.	?		
6	bingo	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		Although bingo is regulated in some jurisdictions, it is not universal. It is relatively low-calibre gambling and does not raise a lot of concerns with me. As Evan points out, it is also a generic word.	Medium concern for misuse. How fast is abuse monitoring response?	Bingo is an expletive words that can mean other things than a game, and even so a fairly low-stakes game associated with in-person charity events rather than online. Not bothered.	
7	casino	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		High concern. Generally regulated and potentially high risk.	High concern for misuse (because it is a word used worldwide). How fast is abuse monitoring response?	Extremely high concern for misuse. Worth consulting industry associations.	Olivier: Wrong colour?
8	charity	Donuts	Will Not Proceed	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact					

		Famous Four	Pre Contract	Registration is limited to entities that can establish that they are a charity or nonprofit with charitable purposes. Registry operator will implement Abuse Prevention and Mitigation Seal to allow users to obtain additional information regarding how to report and address abuse.		Reasonable commitments	High concern for misuse. Mitigation measures appear to be good. How will they be locked into the contract?	Agree with Olivier	
9	cpa	Donuts	Pre Contract	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		Medium concern.	Medium concern for misuse. How fast is abuse monitoring response?	Personally I am against limitation of such an important string to one country. Collaboration (or at least accomodation) between countries that officially accredit accountants would really be helpful for this to be acceptable IMO. Can we get the Australian and American societies to collaborate? I would be VERY comfortable with guidelines they would jointly produce (even if such guidelines were to be enforced by Google of TLDH)	
		American Institute of Certified Public Accountants	Pre Contract	Single-registrant TLD. Applicant will review list of registered domains on a regular basis to ensure that it is not infringing on the rights of third parties.		Community TLD	Medium concern for misuse. Registration restrictions appear satisfactory.		
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
		Top Level Domain Holdings Limited	Pre Contract	Restricted registration policies. Suspension/ deletion of any registrations that do not meet requirement. Will provide single point of contact for law enforcement.		Medium concern.	Medium concern for misuse. How fast is abuse monitoring response?		
		American Institute of Certified Public Accountants	Pre Contract			DUPLICATE	Medium concern for misuse. Nature of applicant appears to point at satisfactory registration restrictions		
		CPA AUSTRALIA LTD	Pre Contract	Registration limited to CPA Australia community--CPA members, students, reciprocal members. Domains must be used in a professional manner and adhere to CPA Australia's code of conduct.		Community TLD	Medium concern for misuse. Registration restrictions appear satisfactory.		
10	creditcard	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		This one I am very tempted to make red. This TLD will not only be used for real credit cards but to quasi-authoritative evaluations.	High concern for misuse. How fast is abuse monitoring response?	Agree with Olivier	Olivier: If high concen why orange?
11	creditunion	CUNA Performance Resources, LLC	Contracted	Registration limited to organizations that have a meaningful nexus with the credit union sector. Initially, domains must correspond to business or trade name. Registry Operator shall have abusive policy.		Reasonable restrictions	Medium concern for misuse. Registration restrictions appear satisfactory.	Agree with Olivier	
12	dds	Top Level Domain Holdings Limited	Pre Contract	Restricted registration policies. Suspension/ deletion of any registrations that do not meet requirement. Will provide single point of contact for law enforcement.		Medium concern, but policies, although not very rigorous, probably consistant with risk	Medium concern for misuse. Registration restrictions appear satisfactory.	DDS is not a very commonly known term so I have less concern for abuse.	

13	dentist	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		This one is a more common term and does not have alternative meanings. Coupled with minimal registration restrictions, it becomes orange.	Medium concern for misuse. How fast is abuse monitoring response?	High concern for abuse. ICANN should be held accountable for delegating such a sensitive string without consideration.
14	doctor	Donuts	Pre Contract	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		Presuming Board restriction (based on advice) limits this to medical doctors, this is not a concern.	High concern for misuse. How fast is abuse monitoring response?	Currently subject to reconsideration request by Donuts. Whoever gets this will need to satisfy GAC/Board restrictions; so long as we monitor this it should be OK.
		Radix	Pre Contract			Presuming Board restriction (based on advice) limits this to medical doctors, this is not a concern.	?	
		The Medical Registry Limited	Pre Contract			Presuming Board restriction (based on advice) limits this to medical doctors, this is not a concern.	?	
15	gmbh	TLDDOT GmbH	Pre Contract	Verification and validation of credentials and Whois. Annual post-registration check of credentials. Registration limited GMBH's, regulatory agencies, association and chambers representing GMBH's. Proxy privacy services not permitted.		Agree with Olivier	Medium concern for misuse. Registration restrictions appear satisfactory.	Agree with Olivier
		InterNetWire Web-Development GmbH	Pre Contract	Verification of Whois. Verification and validation of credentials. Registration limited to GMBH's and gGMBH's. Should a registrant cease to an eligible registrant the operator has the right to cancel the registration. Proxy privacy services not permitted.		Agree with Olivier	Medium concern for misuse. Registration restrictions appear satisfactory.	Agree with Olivier
		Donuts	Pre Contract	Verification of Whois. TLD will operate it in an inclusive manner. Registry Operator will provide, at no cost, a secure web form where applicable governments may verify the organizational status in the applicable jurisdiction of the registrant. Proxy privacy services permitted, but limited in cases of malfeasance.		Government form allows a government to when they find out about a new registration (presumably paying for that service), they can make a comment in the WHOIS entry. Pretty useless.	Medium concern for misuse. Registration restrictions appear satisfactory although this needs further clarification, especially the "online form" for governments	Agree with Olivier
		NU DOT CO LLC	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	

Verify PICs
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16	hospital	Donuts	Will Not Proceed	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact				
17	inc	Uniregistry, Corp.	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		Dot Registry LLC	Pre Contract	Verification and validation of credentials and Whois. Annual post-registration check of credentials. Registration limited to US registered organizations. Proxy privacy services not permitted.		Community TLD: PICs satisfactory.	Medium concern for misuse. Registration restrictions appear satisfactory although clarification needed on "Registration limited to US registered organizations"	Agree with Olivier, but why just US?
		Afilias Limited	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		GMO Registry, Inc.	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		GTLD Limited	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		Top Level Domain Holdings Limited	Pre Contract	Restricted registration policies. Suspension/ deletion of any registrations do not meet requirement. Will provide single point of contact for law enforcement.		Pre-verification would be better but relatively low risk	Medium concern for misuse. Registration restrictions appear satisfactory.	Preferred over Dot Registry's approach.
		NU DOT CO LLC	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
		Donuts	Pre Contract	Verification of Whois. TLD will operate it in an inclusive manner. Registry Operator will provide, at no cost, a secure web form where applicable governments may verify the organizational status in the applicable jurisdiction of the registrant. Proxy privacy services permitted, but limited in cases of malfeasance.		Government form allows a government to when they find out about a new registration (presumably paying for that service), they can make a comment in the WHOIS entry. Pretty useless.	Medium concern for misuse. Registration restrictions appear satisfactory although this needs further clarification, especially the "online form" for governments	Agree with Olivier
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	

18	insurance	fTLD Registry Services LLC	Contracted	Registration limited to government-regulated insurance companies, licensed brokers, and associations, service providers, and government regulators serving the insurance industry. Domain names must comply with appropriate name selection and use requirements. Individual registrants must supply proof of affiliation with insurance community. Company registrants must provide regulatory ID. Agents, brokers, and intermediaries must provide government agency and license ID information. Audits conducted for eligibility and use requirements.		Community TLD: High risk but pre-verification/validation	High concern for misuse. Mitigation measures appear to be good. How will they be locked into the contract?	Agree with Olivier
19	ira	Fidelity Brokerage Services LLC	Pre Contract			Agree with Evan, but there is of course the possibility of it being "repurposed" at some time in the future.	Why is this in the list?	In the US, IRA stands for "individual retirement account", a euphemism for private pension plans in the US. The applicant is a single vendor of such plans, meaning the string won't be abused so much as served by a closed generic.
20	lawyer	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		This is one that I think should require pre-verification/validation.	High concern for misuse because services can be dispense directly on the Internet. How fast is abuse monitoring response?	High concern for abuse. ICANN should be held accountable for delegating such a sensitive string without consideration.
21	LIFEINSURANCE	American Council of Life Insurers	Contracted			Industry association. Strong incentive to be trusted, but not in contract.	High concern for misuse. Mitigation measures appear to be good if the organisation actually implements any. Suggest letting the applicant know.	Agree with Olivier. But if .INSURANCE is properly overseen, abuse here will simply lead to consumer abandonment
22	llc	Top Level Domain Holdings Limited	Pre Contract	Restricted registration policies. Suspension/ deletion of any registrations do not meet requirement. Will provide single point of contact for law enforcement.		Agree with Olivier.	Medium concern for misuse. Registration restrictions appear satisfactory.	Agree with Olivier
		Dot Registry LLC	Pre Contract	Verification and validation of credentials and Whois. Annual post-registration check of credentials. Registration limited to US registered organizations. Proxy privacy services not permitted.		Community TLD: Good Validation/verification. US restriction is a business issue. Not our concern.	Medium concern for misuse. Registration restrictions appear satisfactory although clarification needed on "Registration limited to US registered organizations"	Agree with Olivier. But as the term is used in multiple jurisdictions, restricting use to one country causes significant global public trust issues. See comments on .CPA
		NU DOT CO LLC	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	

Olivier: See other comments

		Donuts	Pre Contract	Verification of Whois. TLD will operate it in an inclusive manner. Registry Operator will provide, at no cost, a secure web form where applicable governments may verify the organizational status in the applicable jurisdiction of the registrant. Proxy privacy services permitted, but limited in cases of malfeasance.		Government form allows a government to when they find out about a new registration (presumably paying for that service), they can make a comment in the WHOIS entry. Pretty useles.	Medium concern for misuse. Registration restrictions appear satisfactory although this needs further clarification, especially the "online form" for governments	Agree with Olivier	
		Afilias Limited	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
		Top Level Design, LLC	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
		myLLC GmbH	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
23	llp	Dot Registry LLC	Pre Contract	Verification and validation of credentials and Whois. Annual post-registration check of credentials. Registration limited to US registered organizations. Proxy privacy services not permitted.		Community TLD: Good Validation/verification. US restriction is a business issue. Not our concern.	Medium concern for misuse. Registration restrictions appear satisfactory although clarification needed on "Registration limited to US registered organizations"	Agree with Olivier	Olivier, Evan: Colour? Note Community TLD
		myLLP GmbH	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?		
24	LOTTO	Afilias Limited	Contracted			High concern. Does implement GAC requirement (except pre verification/validation)	?	Extremely high potential for abuse, with the exception of the apparel manufacturer of that name.	
25	ltd	Donuts	Contracted	Verification of Whois. TLD will operate it in an inclusive manner. Registry Operator will provide, at no cost, a secure web form where applicable governments may verify the organizational status in the applicable jurisdiction of the registrant. Proxy privacy services permitted, but limited in cases of malfeasance.		Government form allows a government to when they find out about a new registration (presumably paying for that service), they can make a comment in the WHOIS entry. Pretty useles.	Medium concern for misuse. Registration restrictions appear satisfactory although this needs further clarification, especially the "online form" for governments. Proxy Services?	Agree with Olivier	Evan, Olivier: Colour?

26	LTDA	DOMAIN ROBOT SERVICOS DE HOSPEDAGEM NA INTERNET LTDA	Contracted			Agree with Evan, but sito llc, ltd	?	Portuguese for "LTD". High concern for misuse where applicable.
27	medical	Donuts	Will Not Proceed	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact				
28	mutualfunds	Fidelity Brokerage Services LLC	Pre Contract			Agree with Evan, but there is of course the possibility of it being "repurposed" at some time in the future.	High concern for misuse. More information needed	See comments on .IRA . This is a "closed generics" issue more than an abuse one.
29	MUTUELLE	Fédération Nationale de la Mutualité Française	Pre Contract			Agree with Olivier	Applicant appears to be legitimate user for gTLD	Agree with Olivier
30	PHARMACY	National Association of Boards of Pharmacy	Contracted	Registration limited to online pharmacies and related entities that meet all regulatory standards in the jurisdictions in which they are based and in which they do business. Validation process under evaluation. Registrants must limit registration to business or trade name. Generic domains not initially reserved/allocated by the registry would not initially be permitted to be registered until discussed within the broader community. Registry operator is looking into active monitoring options for non-compliant activity. Potential creation of policy advisory board		Agree with Olivier	High concern for misuse. Mitigation measures appear to be good. How will they be locked into the contract?	Agree with Olivier
31	POKER	Afilias Domains No. 5 Limited	Contracted			Mixed feelings on this one and can go either way. Some level of PICs would push me to green.	Low concern for misuse due to string itself being a gamble...	Unlike most other casino games where it's "player versus house", poker is "player versus player" with the host skimming a percentage. Significant potential for abuse.
32	sarl	Donuts	Contracted	Verification of Whois. TLD will operate it in an inclusive manner. Registry Operator will provide, at no cost, a secure web form where applicable governments may verify the organizational status in the applicable jurisdiction of the registrant. Proxy privacy services permitted, but limited in cases of malfeasance.		Government form allows a government to when they find out about a new registration (presumably paying for that service), they can make a comment in the WHOIS entry. Pretty useless.	Medium concern for misuse. Registration restrictions appear satisfactory although this needs further clarification, especially the "online form" for governments	Agree with Olivier

33	spreadbetting	IG Group Holdings PLC	Contracted			Like .bet. Hard to imagine how it could implement pre-registration checking. Also, as much opportunity for education as gambling - MAYBE	?	
34	SRL	mySRL GmbH	Pre Contract	Registrations limited to corporations with credentials. Suspension/ deletion of any registrations do not meet requirement. Non-Compliance Contact will be established by the Registry Operator.		Agree with Olivier	Medium concern for misuse. Registration restrictions appear satisfactory.	Agree with Olivier
		Google	Pre Contract			Medium concern. Does implement GAC requirement (except pre verification/validation)	?	
35	surgery	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		I tend to be less concerned with this one. Plenty of valid uses. Remediation of invalid data needs to be looked at more carefully	High concern for misuse. How fast is abuse monitoring response?	Agree with Olivier
36	university	Donuts	Contracted	"Open" registration policy, rights protection mechanisms including Whois audits and remediation of inaccurate data, Domains Protected Marks List, abuse monitoring and point of contact		I have some concern. .EDU is still restricted. I can see legitimate use as 3rd level domains under selected controlled 2nd level entries (for evaluations, etc.)	Low concern for misuse. Also - .EDU is already an open gTLD which was restricted in the early days.	.EDU is still restricted. In most countries the term "university" has an official designation and credential. High concern for misuse.
37	vermögensberater	Deutsche Vermögensberatung Aktiengesellschaft DVAG	Contracted			Agree with Olivier	Applicant appears to be legitimate user for gTLD	Agree with Olivier
38	versicherung	dotversicherung-registry GmbH	Contracted	Verification and validation of credentials. Registration restricted to eligible insurance community members in Austria, Germany, Liechtenstein and Switzerland. Annual post-registration validation of credentials. Further levels of enforcement include appeals under the Eligibility Requirement Dispute Resolution Policy as well as court appeals under URDP or national courts.		Agree with Olivier	High concern for misuse. Mitigation measures appear to be good. How will they be locked into the contract?	Agree with Olivier

39	慈善	Zodiac	Contracted	Registry Operator will publish registration policy for public comments for 60 days. Governments are invited to provide additional registrant eligibility criteria requirements, which shall be implemented within 180 days. The Registry Operator shall carry out routine zone file scanning designed to detect possible registration abuse.		PIC is very clear - pre-registration validation. During the public comment period or any time thereafter, governments are invited to provide Registry Operator with additional registrant eligibility criteria and documentation requirements ("Additional Requirements). Such Additional Requirements shall be implemented by Registry Operator within 180 days. Applications from those jurisdictions after the governments have provided Additional Requirements will not be accepted until and unless the Additional Requirements are implemented.	Low concern for misuse. Registration restrictions appear satisfactory.	Is the registry sure to implement ALL eligibility information provided by governments? The process is far too open ended for my liking.	Evan, see Alan's comment
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