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28 August 2017

Via Email

RE: RySG comments on the Proposed Implementation of the Protection of IGO&INGO Identifiers

Mr. Stéphane Van Gelder Vice Chair, gTLD Registries Stakeholder Group (RySG)

Dear Stéphane,

Thank you for the RySG public comment submission on 9 July 2017 on the Proposed Implementation of GNSO Consensus Policy Recommendations for the Protection of IGO & INGO Identifiers in all gTLDs now posted here: https://mm.icann.org/pipermail/comments-igo-ingo-protection-17may17/2017q3/000001.html

ICANN's Global Domains Division (GDD) policy implementation team has been consulting with the Implementation Review Team (IRT) to review your comments.

You may recall that our proposed implementation had envisioned a 6-month implementation duration from the date of policy publication. It is our understanding that the RySG is requesting a 12-month implementation duration from the release date of the INGO Claims System specification.

RySG Comment: "8. Policy implementation date (1 February 2018).

a. An implementation date of 1 February 2018 may not provide proper time for Registry Operators to prepare for new processes or integration with the INGO Claims System. However, the preferred approach is to leverage TMCH for Claims Services. Therefore, we recommend setting an implementation no earlier than 12 months from the approval of the specifications."

We understand your concerns and appreciate the need to provide adequate time to registry operators to prepare and implement new services. However, in our discussions with the IRT, we've been informed that some registry operators would prefer this policy implementation to occur as soon as possible. Upon further discussions, it became clear that those registry operators looking for an earlier implementation date are concerned with the exceptions procedure that pertains to the Red Cross, IOC and IGOs only and not the INGOs. Your comment seems to support this view as you've called out the INGOs specifically in recommending the extended implementation time.

Therefore, the implementation team has proposed an alternative approach that could be satisfactory to the RySG as well as other registry operators. Rather than having one policy effective date, we are proposing two dates; one for INGOs that allows the 12-month implementation duration from release of the specification, and another date for Red Cross, IOC and IGOs that keeps the 6-month implementation duration. Furthermore, we are proposing a "no later than" effective date for the Red Cross, IOC and IGOs to provide access to the exceptions procedure as early as the policy announcement for those contracted parties who are prepared to implement earlier than the deadline.



To make this clear, we have redlined the affected policy language and reviewed with the IRT as follows:

2. Policy and Effective Dates

This Policy is effective for all gTLD Registry Operators and ICANN-accredited Registrars on 1 February 2018.

2.1. For the Red Cross, IOC, and IGOs, the Policy is effective for all gTLD Registry Operators and ICANN-accredited Registrars on no later than 1 March 2018

2.2. For the INGOs, the Policy is effective for all gTLD Registry Operators and ICANN-accredited Registrars 12-months after the release of the INGO Claims System Specification.

Before we proceed with this revision and publication of the policy, we'd appreciate the RySG's review of our interpretation of your comment and more importantly, RySG's support of the new approach to the policy implementation with two effective dates.

Thank you for your continued and collaborative efforts toward an acceptable path forward for the IGO & INGO Policy Implementation.

Sincerely,

Dennis Chang

GDD Services and Engagement Program Director

Cc:

Mr. Paul Diaz - Chair, gTLD Registries Stakeholder Group

Mr. Russ Weinstein - Director, Registry Services & Engagement, Global Domains Division