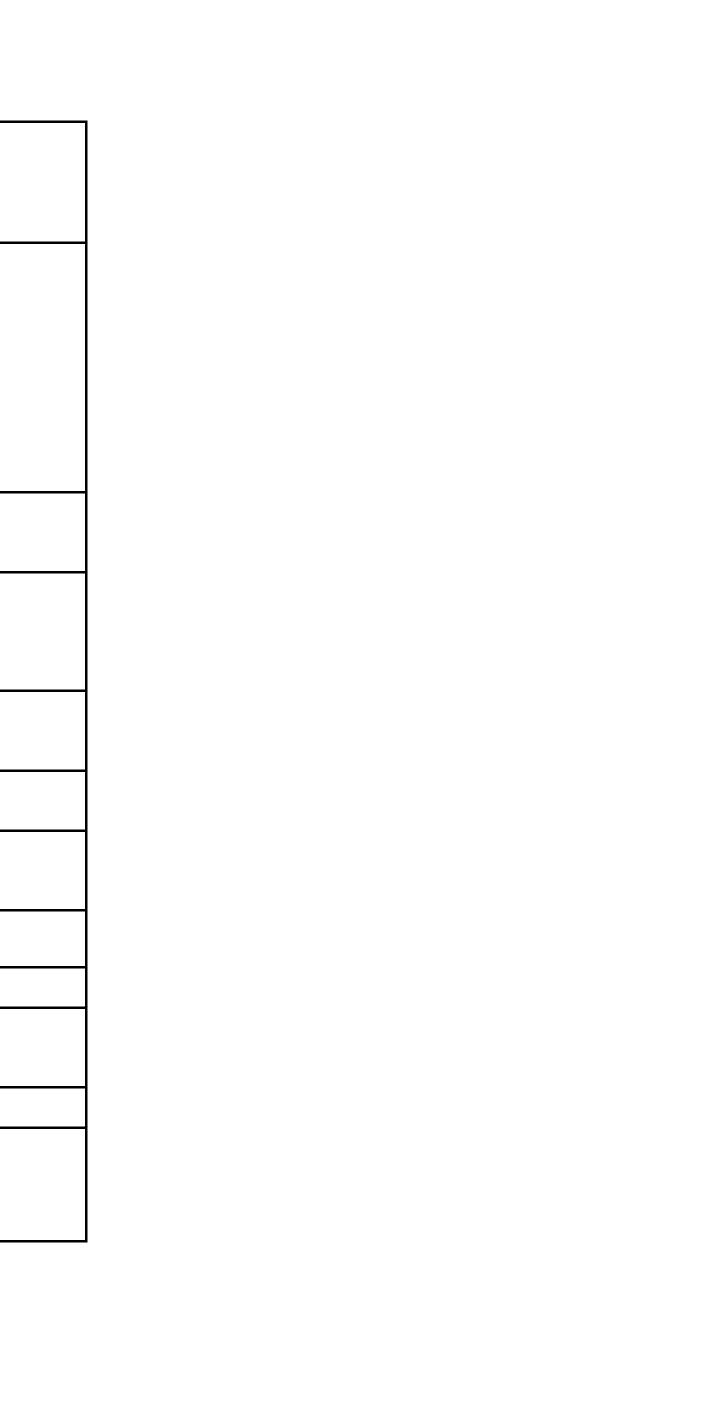| Marketplace Health Index--Comments and Input Tracking Tool			
This tracking tool incorporates comments from the following:		Last Updated: 15 November 2016	

1. Public Comment Forum: gTLD Marketplace Health Index (Beta): Call for Comments

Open Date:	19-Jul-16	Close Date:	9-Sep-16
Name		Submitted by/Affiliation	Initials
Registries Stakeholder Group		Stephane Van Gelder	RySG
Rightside		Statton Hammock	RIGHT
INTA		Lori Schulman	INTA
Donuts Inc.		Mason Cole	DON
Business Constituency		Steve DelBianco	BC
Verisign Inc.		Andy Simpson	VS
Registrar Stakeholder Group		Graeme Bunton	RrSG
At-Large Advisory Committee		Policy Staff	ALAC
Domain Mondo		John Poole	JP
Hosterstats.com		John McCormack	JMcC

2. Messages sent to ICANN staff related to the public comment forum and Oct. 26 Advisory Panel call.
3. 10/26/16 gTLD Marketplace Health Index Advisory Panel Call (where noted as APCall1)
4. ICANN57 Project Overview Session, 7 November (noted as ICANN57_Overview)
5. ICANN57 Advisory Panel working meeting, 8 November (noted as ICANN57_work)

18) Category R: ccTLD Data			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
18.1 "The graphic displaying the growth of the overall domain name market on page 5 is helpful in showing whether the market is healthy, as growth indicates health. It might be interesting to compare this growth with the total growth in registration of second level domain names, including those in Country Code Top Level Domains (ccTLDs). The growth in registrations under ccTLDs should be included on the same graph too." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel. ccTLD data has not been included in the Index to date by design, but this topic will be discussed with the Advisory Panel (whether this approach should be changed).	
18.2 "This was stated during the feedback to the advisory panel but needs to be said again after ICANN has failed to provide a justification for excluding the ccTLD market other than data availability. While it is mutually understood that accurate and consistent data regarding the ccTLD market is not widely available, developing a marketplace health index that fails to measure the entire marketplace is incomplete. gTLDs and ccTLDs coexist in the eyes of end users. When most registrants are evaluating domains to buy, they are often not aware of this distinction that those inside the domain industry use. ccTLDs represent 45% of the overall domain marketplace3 and it is not possible to effectively measure the competitive landscape without considering them. Obviously, gTLDs and ccTLDs compete for the same customers. This is particularly true for Geographic focused gTLDs and the overlapping ccTLDs (.london and .uk, for example). Yet, in the beta report, ICANN presents trends in Geographic focused TLDs but does not include the overlapping ccTLD trends. Indeed, many ccTLDs (.co, .ly, .tv, .io as just a few examples) brand themselves as gTLDs, further necessitating their inclusion in the marketplace analysis." (VS)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel. ccTLD data has not been included in the Index to date by design, but this topic will be discussed with the Advisory Panel (whether this approach should be changed).	
18.3 "The ccTLD data may be an issue as it is not comparing like to like. The ccTLDs have an "adjacent market" effect where not all registrations in the ccTLD are from that ccTLD's country. This can be down to brand protection, speculation and businesses that are geographically close doing business with that country. In addition to the imprecise nature of ICANN registrar by country grouping, it may not provide an accurate view of these markets. Some ccTLD registries may not be willing to provide data in excess of what they publish publically or annually. A ccTLD market is very different from a gTLD market in terms of focus (only the geographical new gTLDs come close to the same kind of market focus) so it would be logical to compare only gTLD registrations associated with that country to a ccTLD." (JMcC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel. ccTLD data has not been included in the Index to date by design, but this topic will be discussed with the Advisory Panel (whether this approach should be changed).	
18.4 "ccTLD data will be highly market specific (geographical) and might not compare well with global gTLD data." (John McCormac - HosterStats.com: APCall1, chat at 11:42)	**Active**	ICANN appreciates this feedback. This was read aloud during the Oct. 26 advisory panel call and will be revisited with the Panel as we discuss this topic in greater depth in subsequent meetings.	

18.5 "I would go against including ccTLD data… Simply because it would require cooperation from ccTLD registries that are depend on their local jurisdictions. No way to standardize as with whois data." (Ivan Rasskazov: APCall1, chat at 11:42)	**Active**	ICANN appreciates this feedback. This was read aloud during the Oct. 26 advisory panel call and will be revisited with the Panel as we discuss this topic in greater depth in subsequent meetings.	
18.6 (Additional discussion re: ccTLD data from APCall1, chat transcript times as marked) Andy Simpsonn: (11:43) Can you be more specific about the rationale behind why exclusion is important? Jonathan Zuck: (11:43) and yet ccTLDs are direct competitors to gTLDs John McCormac - HosterStats.com: (11:44) also ccTLD registrars are not necessarily gTLD registrars Katrin Ohlmer	DOTZON: (11:44) ccTLD data would compare well with GeoTLD data Michiel: (11:48) With us only 10% of (.nl) registrars are ICANN accredited John McCormac - HosterStats.com: (11:50) also a lot of ccTLD registrars outsource their gTLD registrations activity to large gTLD registrars.	**Active**	ICANN appreciates this feedback. This was read aloud during the Oct. 26 advisory panel call and will be revisited with the Panel as we discuss this topic in greater depth in subsequent meetings.	
18.7 "ccTLD organisations such as CENTR, APTLD, LACTLD and AfTLD. track a subset of the metrics of this index and could contribute to a broader view of the domain industry." (ICANN57_Overview (Chat), Rubens Kuhl: (09:25)	**Active**	See discussion topics at top right of this sheet.	
18.8 "The issue with ccTLDs is that the domain name market at a country level is quite different to that at a registrar or global level. Resellers/hosters play a far more important part in country level markets. Some countries do not even have accredited ICANN registrars but still have vibrant gTLD/ccTLD markets." (ICANN57_Overview (chat) John McCormac - HosterStats: (09:27)).	**Active**	See discussion topics at top right of this sheet.	
18.9 "Google lists the following ccTLDs as operating in a generic non-country-targeted fashion: .ad.as.bz.cc.cd.co.dj.fm.io.la.me.ms.nu.sc.sr.su.tv.tk.ws" (ICANN57_Overview (Chat) Rubens Kuhl: (09:30)).	**Active**	See discussion topics at top right of this sheet.	
18.10 "Most gTLDs are global whereas most ccTLDs are country focused - different markets." (ICANN57_working (chat) John McCormac - HosterStats.com: (09:20).	**Active**	See discussion topics at top right of this sheet.	
18.10 "The best ccTLD for a gTLD:ccTLD comparison is .eu. It is essentially a gTLD in all but name with a set of country level markets and a single "global" market" (ICANN57_working (chat) John McCormac - HosterStats.com: (09:56))	**Active**	See discussion topics at top right of this sheet.	
18.11 [Q-should ccTLDs be included?] "Definitely… (ICANN57_Overview, Steve DelBianco, 16:45), Users make choices and the cc is part of that space (ICANN57_Overview, Steve DelBianco, 22:30)	**Active**	See discussion topics at top right of this sheet.	
18.12 ccs should be included. (ICANN57_Overview, 21:30 Roelof Meijer – SIDN)	**Active**	See discussion topics at top right of this sheet.	
18.13 There are a lot of organizations that already do this with ccTLD data. ICANN could be the entity that pulls all that data together but should do it in a way that includes data already collected by the chartered organizations. (ICANN57_Overview Thomas Keller 25:30)	**Active**	See discussion topics at top right of this sheet.	
18. 14 ccTLDs should absolutely be included. (ICANN57_Overview, Jim Prendergast, 44:45)	**Active**	See discussion topics at top right of this sheet.	
18.15 We definitely need to include ccTLDs, in multiple ways. (a) growing number are marketed like gTLDs (.tv, .co, etc) and (b) to really understand the market we need some regional analysis of ccTLDs that are dominant in their markets (see recent LAC report showing that ccTLDs are very strong in some areas, and other areas where they are not) (ICANN57_Work, Jonathan Zuck ~5:20)	Active	See discussion topics at top right of this sheet.	

18.16 It's sort of obvious that we should only include ccTLD data where it is relevant, applicable, and available. ICANN can't compel ccTLD registries to offer any data they don't want to offer. Some business models are different among ccTLDs (direct sale and not, etc). So consider these three words--relevant, applicable and available. We have a lot of ccTLD data from regional orgs (CENTR, AFTLD, LACTLD, etc) only true ccTLDs that are not covered by these orgs are ccTLDs in North America--everything else we can get from the regional orgs. (ICANN57_work, Rubens Kuhl ~7:00)	**Active**	See discussion topics at top right of this sheet.	
18.17 My first instinct re: including ccTLDs is that the markets aren't always the same (but aren't the same for all gTLDs either). The point is that this isn't an exact science. There may be some data that is unavailable for some ccTLDs but if you look at actual magnitude/registrations we can't really treat a ccTLD with 5k regs as the same as 5 million regs, but the data for the 5 million regs is probably more likely to be available. I'm all for including ccTLDs. (ICANN57_work, Olivier Crepin-Leblond ~9:00)	**Active**	See discussion topics at top right of this sheet.	
18.18 Another issue--competition among backend providers for ccTLDs. And backend providers providing services for gTLD registries. (ICANN57_work, Jim Prendergast, ~10:45)	**Active**	See discussion topics at top right of this sheet.	
18.19 I certainly support the inclusion of all TLDs. When one goes and looks at health indices and performance you just need to be aware that some are open to registrations from anyone; others are more restricted. It's important to understand what the registry agreements look like with respect to who can acquire a domain on a particular registry. (ICANN57_Work, Gabe Fried ~12:15)	**Active**	See discussion topics at top right of this sheet.	
18.20 Potential data sources for ccTLD data--CENTR, Verisign, LACTLD report--many listed in slides starting on slide 7. Registries are reporting quite granularly. (ICANN57_work, Andy Simpson, presentation supporting inclusion of ccTLD data in health index. http://schd.ws/hosted_files/icann572016/1e/Marketplace%20ccTLD%20Data.pdf)	**Active**	See discussion topics at top right of this sheet.	
18.21 Not against including ccTLD data, but it is important for the data to be relevant and reliable. ICANN cannot collect ccTLD data as easily as gTLD data. If we make this too complex, if data is too difficult to obtain, we may take away from utility of the Index. Move slower and add over time. (ICANN57_Work, Ivan Rasskazov, presentation (no slides) starts at ~34:00, difficult to hear on recording)	**Active**	See discussion topics at top right of this sheet.	
18.22 Supporting inclusion of ccTLD data despite some differences in restrictions (gTLDs have varied restrictions, too)(ICANN57_work, Rubens Kuhl, ~39:00)	**Active**	See discussion topics at top right of this sheet.	
18.23 Including ccTLD data is obvious--there isn't much of a difference to consumers. Contract differences may make data collection more difficult but that's a separate issue. Doesn't mean we stop trying bc we can't get it perfect. May have to do some sort of cost/benefit analysis to collecting the data but shouldn't exclude ccTLD data at the outset. (ICANN57_work, Jordyn Buchannan, 40:15)	**Active**	See discussion topics at top right of this sheet.	
18.24 Concerns about data availability more important if this is an "Index." if this is a repository (ICANN publishing data without making judgments and letting others do analyisis) it is less important--just a fact that the data is there or it isn't. (ICANN57_work, Jim Prendergast ~44:00)	**Active**	See discussion topics at top right of this sheet and also in "general feedback" category--discussion surrounding re-naming of this project.	
18.25 I disagree--I don't think there is a consensus that ccTLDs and gTLDs are the same in the eyes of the consumer. (ICANN57_work, Kathy Kleiman ~45:15)	**Active**	See discussion topics at top right of this sheet.	

Relevant Discussion Questions	Decision Points		Carry-over topics to discuss in later stages
1. Should ccTLD data be included in the Index?	1. It appears that the group is nearing agreement that ccTLDs should be incorporated into the Index to the extent the data is available and it is feasible to collect and report it.		1. Consider adding growth in ccTLDs to competition metrics
2. Where could ICANN obtain ccTLD data for the Index?			2. How can ICANN account for differences between ccTLDs and gTLDs (and, for that matter, among different types of gTLDs) so that we are comparing "apples to apples" when looking at the relevant data?
			3. How could ICANN expand competition metrics to explore competition among others in the supply chain, including backend providers, resellers, etc?

1) Category A: General Feedback			
Issue/Suggestion/Recommendation	**Status**	**Staff-Proposed Response/Comments**	**Final Disposition**
1.1 "Your gTLD Marketplace Health Index (Beta) is severely flawed and should not be used. You have failed to define the "marketplace" properly[.]" (JP)	**Active**	ICANN has taken note of this input. ICANN will discuss the overall scope of this project and specific definitions therein with the Advisory Panel. See Discussion question 1 on this category.	
1.2 "INTA commends ICANN for its role in collecting and promoting the use of objective metrics to help the community study these issues. INTA fully supports the concept of the Index insofar as it can be used to objectively measure consumer trust in the gTLD marketplace and assist the community in identifying ways to improve that level of trust." (INTA)	**Active**	This comment has been included in the list of discussion topics for consideration by the Advisory Panel. See carry-over topic 1.	
1.3 "We appreciate ICANN's efforts toward the development of this Beta report, and recognize that the initiative to establish a gTLD Marketplace Health Index advances ICANN's core mission. The BC supports ICANN's priority attention to the implementation of this Index." (BC)	**No Action Required**	ICANN thanks the Business Constituency for this feedback. This was not included in the Advisory Panel "discussion topics" document because there was no action item or qualifying statement (ie, some factor that should be emphasized going forward, as was the case in items 1.1 and 1.2 above).	

1.4 "I think this tool is good. We have been using it on amendments to the Registry Agreement." (Statton Hammock, APCall1 11:15 chat, regarding use of the public comment tracking tool)	**Active**	ICANN appreciates this feedback and will continue to experiment with this tool during this project and discuss its use with the Advisory Panel.	
1.5 "Thanks for using the tool it looks like it should help with keeping track of issues." (Andy Simpson, APCall1 11:16 chat, regarding use of the public comment tracking tool)	**Active**	ICANN appreciates this feedback.	
1.6 "How and when are new issues going to be added to the list of items being tracked?" (Andy Simpson, APCall1, Chat at 11:17)	**Active**	ICANN appreciates this feedback. Using this tool in this context, to track input during both a public comment period and more broadly during this Advisory Panel consultation is a new approach in this project. Keeping this list fully up-to-date with every topic and question raised on each call may be unduly burdensome, but staff plans to try this at the outset and we can revisit this process with the Advisory Panel as the project proceeds.	
1.7 "ICANN having a chief scientist or chief statistician is a great idea." (ICANN57_Overview (chat) Robert Guerra/SSAC: (09:35)).	**Active**	Will discuss with Advisory Panel (see discussion question 2).	

1.8 "I wish to voice my agreement with Jonathan's and Jay's point that ICANN establish a new department focused on data collection and analysis headed by a competent data scientist. For years, ICANN's decision-making processes have been data starved, mainly due to lack of financial resources. If one thinks of ICANN's core competencies, one should be to be a leader in date access and analysis. With sufficient budget, ICANN can now become an industry leader in this area." (ICANN57_Overview (chat) Kurt Pritz: (09:45)).	**Active**	Will discuss with Advisory Panel (see discussion question 2).	
1.9 [Response to question—should ICANN be doing this?] "Sure" (ICANN57_Overview Steve DelBianco, 16:30)	**No Action Required**	ICANN appreciates this feedback.	
1.10 With regard to priorities, staff and management had the priority of promoting the domain name industry, in particular the gTLD space, but that's not ICANN's job… ICANN's commitments reflect ICANN's fundamental compact with the global internet community. The ultimate interest is in serving that community—registrants. This process is driven by the corporation but that's an advantage—can move faster but doesn't mean we have to. The community wants more data—give them that (ICANN57_Overview Steve DelBianco, 18:00)	**Active**	See Discussion question 3 and carry-over topic 2.	

1.11 when ICANN staff and management drive the collection and selection of metrics you have to look at the path that came from, the priorities that ICANN management has and the process that's used… Staff and management had the priority of promoting the gTLD industry but that's not ICANN's job." (ICANN57_Overview, Steve DelBianco, 16:45)	**Active**	See Discussion question 3 and carry-over topic 2.	
1.12 The purpose of this is to verify the influence of ICANN's work and the choices it makes. Should ICANN execute this work? Honestly, I don't think so. ICANN has difficulty leaving its own perspective and taking a more general perspective—I'd recommend leaving this to an expert org. (ICANN57_Overview, 20:30 Roelof Meijer – SIDN)	**Active**	See discussion question 3.	
1.13 The process of gathering credible empirical data really needs to be ICANN's role—if not ICANN, who? The key is to find (for stability and trust) datasets that are not only about the health of the industry (not just volume of domains, how long they stay up, and what they are used for) but also need to look at abuse indicators to understand how abuse can impact perceptions of the marketplace and trust in the marketplace (ICANN57_Overview Jeff Bedser, 23:25)	**Active**	See carryover topics 1 and 2.	

1.14 Beta says a lot about what we have currently—question about how far we want to go. A lot of data is still missing. Data when it comes to compliance, the relative cases to compliance for example, if we do this and do things really within the remit of ICANN with the contracted parties… (ICANN57_Overview Thomas Keller 24:45)	**Active**	See carry-over topic 3.	
1.15 A lot of this data is available because of the CCT review. Absent theory data is less useful. Raw numbers are less interesting than the concentration numbers. Etc. What does having one additional registry mean? Which TLDs are registrars actually offering? A data dump can be a difficult problem.	**Active**	See discussion questions 2 and 3.	
1.16 This is a simplistic interpretation. ICANN is the organization to do this but I don't think they're ready to do so yet. ICANN needs a mature senior level data science position. This is amateurish. Having the community arguing about how to interpret this could do more harm than good. (ICANN57_Overview, Jonathan Zuck, 26:30)	**Active**	See discussion questions 2 and 3.	

1.17 There is a lot of momentum on this—doesn't appear we can stop this train so need to focus on the cars. Compensation is based on plans for this, but don't leave community behind. Give us the other metrics we need. Abuse. Include CCs, etc. (ICANN57_Overview, Steve DelBianco, 31:00)	**Active**	Reflected in other comments in other categories of this tracker.	
1.18 This isn't an index, it's a dashboard (referring to process for obtaining "percentage complete" number reported in icann.org/progress dashboard) (ICANN57_Overview Steve DelBianco, 35:20)	**Active**	See discussion topic 1	
1.19 Re: open data: It is vital to have competing indices about this type of thing. ICANN could have one, DNA could have one, and we can work out which one is best. I really don't think we should be trying to aim for one now—the process of competition will eliminate the bad. (ICANN57_Overview, Jay Daly .nz ~37:00)	**Active**	See discussion topics 2 and 3.	
1.20 ICANN needs a chief data officer and start taking data seriously. As of today ICANN has announced open data pilot initiative. No discussion of community engagement but things are clearly starting to work. ICANN's reaction to a chief data office has been (a) horror or (b) we already do data. In order for us to really use this we need the data not just published in a PDF but released in a usable format (ICANN57_Overview, Jay Daly .nz ~37:00)	**Active**	See discussion topics 2 and 3.	

1.21 Health Index is important and needs a lot more work. The conclusion I can draw from the draft report is that GDD looked at the data at hand and created a health index based on that rather than the metrics actually needed to provide the community with insight, in particular into stability and trust.(ICANN57_Overview Denise Michel ~40:45)	**No further action needed**	ICANN is using this tracking tool, and also discussed this topic with a BC representative following the first public comment forum on this topic, which closed in January 2016. ICANN provided the BC with a detailed tracker showing exactly how BC comments were incorporated and where they were not at that stage of the project.	
1.22 BC provided very detailed comments and specific recommendations. They were largely ignored and certainly weren't responded to in a substantive way. We had a number of suggestions. I would request that GDD staff go back and respond substantively to our specific recommendations and give us more confidence that this index will be created not just to promote domain names but actually to give the community useful meaningful metrics.(ICANN57_Overview Denise Michel ~40:45)	**Active**	ICANN will work with the advisory panel to enhance trust and stability metrics in the 1.0 version of this Index.	
1.23 At next stage, really try to address trust and stability in a way that is meaningful. (ICANN57_Overview Denise Michel ~40:45)	**Active**	See carry-over topic 1.	

1.24 The timing of asking whether ICANN should be doing this is perplexing, considering the timeline shows we are well into this project. (ICANN57_Overview, Jim Prendergast, 44:45)	**No further action needed**	ICANN notes this feedback.	
1.25 If you are tracking health, not enough to know if trend is going up or down—would want to know if the "patient" is healthy or not. If we are just publishing data for others to interpret, this is data, not an index of health. (ICANN57_Overview, 56:30 Roelof Meijer – SIDN)	**Active**	See discussion topic 3.	
1.26 The name is misleading—revisit it (ICANN57_Overview Jeff Bedser, 59:40)	**Active**	See discussion topic 3.	
1.27 I am troubled by this. If you call it a health index, you have to figure out how it impacts the health of the marketplace. I had trouble figuring out how the metrics actually relate to health. You can really game this thing. We have to be very careful how we choose these things.(ICANN57_Overview, Roland LaPlante, Affilias, ~1:00)	**Active**	See discussion topic 1.	

1.28 It's impossible not to draw conclusions from this data—ICANN is going to have to and will have to act in some way. I'm worried about what ICANN will do with the data. If you aren't going to draw conclusions this is a waste of time. (ICANN57_Overview, Roland LaPlante, Affilias, ~1:00)	**Active**	See discussion topic 1	
1.29 The TLD marketplace is distinct from the entire "domain name marketplace"--the strategic goal refers to the domain name marketplace, not just the TLD marketplace…we need to understand what the goal really is. (ICANN57_Work, Gabe Fried, ~7:50)	**Active**	See discussion topic 1	
1.30 There seems to be universal agreement that we are not creating an Index here. Is it OK to ignore the word "index"? Can we also ignore the word "health"? (ICANN57_Work, Steve DelBianco ~9:20)	**Active**	ICANN appreciates this input and we will discuss this topic with the Advisory Panel. See discussion topics 1, 3	
1.31 Maybe we think of each metric as an index instead of the whole thing as an Index--put these bricks out there that others can use to create their own roll-up metric if they wish to do so. (ICANN57_Work, Gabe Fried ~11:30)	Active	ICANN appreciates this input and we will discuss this topic with the Advisory Panel. See discussion topics 1, 3 .	
1.32 Figuring out what we mean by health will help us decide what should be included or not. Let's collect data that's relevant. (ICANN57_work, Jonathan Zuck ~38:00)	Active	See discussion topic 1.	

Relevant Discussion Questions	Decision Points		Carry-over topics to discuss in later stages
1. Should ICANN revisit the definition of "marketplace"? Should we change the name of this project? If so, what should it be and why?			1. Will this be used to objectively measure trust and assist the community in identifying ways to improve that level of trust (including impacts of abuse on trust)?
2. Should ICANN appoint a chief data scientist/statistician beyond current staffing/efforts (including open data initiative)?			2. Does this project reflect ICANN's overall mission in serving registrants?
3. Should this project evolve into a data repository initiative and, if so, what does that look like?			3. Can we expand data provided related to Compliance?
			4. How can we track trust and stability in a meaningful way?

8) Category H: Robust Competition (Scope and Definition)

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
8.1 "Donuts has reservations about attempting to assign metrics to such subjective matters, particularly those that involve perceptions instead of quantifiable data or demonstrable fact. Upon what criteria, for example, can a perception of fairness be established? To be sure, ICANN participants, depending on their individual points of view or those of whom they represent, can find nearly any reason to perceive unfair treatment. This is a very slippery path for ICANN to attempt to traverse. Quantifiable measurements—and a rewording of this definition (e.g., "Marketplace competition is independently measured as fair")—are much more preferable." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
8.2 "The stated goal in the beta report is to determine if "The commercial marketplace is thriving" and the assumed definition of what this looks like is "growth in new gTLDs and across all gTLDs." This has not been established as an effective measure for measuring the health of the marketplace and is easily influenced by many factors not captured by the index today as noted by Professor Bhargava." (VS)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
8.3 "Before discussing the metrics, evaluating the definition is important. In the example of robust competition, who is supposed to have diversity of choice to experience competition? Registries, registrars, or end users?" (ICANN57_work (chat) Andy Simpson: (09:59))	**Active**	See Discussion Question 3	
8.4 The web dev business has become commoditised. It is often the web developer who registers the domain for the client rather than an individual registrant" (ICANN57_work (chat) John McCormac - HosterStats.com: (10:05))	**No action required**		
8.5 "ICANN accredited registrars are generally mature market entrants. There are often hundreds or thousands of hosters in a market before this happens." (ICANN57_work (chat) John McCormac - HosterStats.com: (10:15))	**No action required**		
8.6 " Most hosters outsource their gTLD ops to registrars either in -country or outside of the country" (ICANN57_work (chat) John McCormac - HosterStats.com: (10:16)).	**No action required**		

8.7"Web development is now commoditised so web developers tend to register doms for their clients." (ICANN57_work (chat) John McCormac - HosterStats.com: (10:17)	**No action required**		
8.8 I'm assuming that, in the competition definition when it refers to "players" we are talking about multiple parties--registries, registrars, registry/registrar service providers, etc (ICANN57_work, Jonathan Zuck ~101:00)	**Active**	See Discussion Question 4	
8.9 Re: service model--I'm not seeing anything about the type of domains that are being offered (ie, premium, $1 a domain, etc--pricing thresholds) and there is a difference between the two. (ICANN57_work, Olivier Crepin-Leblond, ~102:00)	**Active**	See Discussion Question 5	
8.10 With diversity should also look at services offered in languages and scripts (ie, if a registrant has access to registrar in their language/script but the Rr doesn't offer the service they need (e.g. privacy/proxy) is there really diversity in choice, etc?(ICANN57_work, Steve DelBianco ~1:05)	**Active**	See Discussion Question 6	
8.11 It would also be interesting to add payment methods to this diversity category. (ICANN57_work, Rubens Kuhl, ~1:11)	**Active**	See Discussion Question 7	

Relevant Discussion Questions	Decision Points		Carry-over topics to discuss in later stages
1. Should ICANN consider utilizing surveys and other means to gauge perceptions for additional metrics (ie marketplace is perceived to be fair?)			Many suggestions identified in this category could be added for discusison when we get to substantive discussion of v1 "competition" metrics.
2. Is growth a useful measure?			
3. Revisit definition of "robust competition"--diversity for whom?			
4. Define who the "players" are.Should measures be extended to look at others in the supply chain, ie hosting companies, resellers, backend service providers, etc?			
5. What does diversity in service model mean? (pricing differences?)			
6. Consider combining "language" and "script"--these go hand-in-hand.			
7. Consider looking at available payment methods.			

All topics subsequent to this page have yet to be discussed with the Advisory Panel.

This section divider will be moved over time to serve as a 'bookmark', delineating topics that have been/not yet been discussed with the project's advisory panel for their input on the best way forward.

2) Category B: Metrics Development Process-Beta			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
2.1 "We note some modest improvements in the index as compared to the prior version in response to community comments, including separating out brand and legacy registrations for relevant indicators, removing the RSEP as an indicator for innovation, including additional registration statistics beyond renewal rates, and using registry/registrar families as the principal unit for some relevant indicators. However, ICANN has still failed to account for a number of key weaknesses raised by the RySG in our prior comments in the modified version, nor responded to why these indicators should remain in the staff summary." (RySG)	**Active**	ICANN thanks the Registry Stakeholder Group for this feedback. Going forward, ICANN commits to increase transparency surrounding the handling of public comments on this project by documenting the response to or action resulting from each public comment, using this tracking form.	
2.2 "While we recognize the diversity of comments received makes it difficult to factor in all recommendations, we believe that ICANN staff should be providing more thorough response and analysis, particularly where comments are not incorporated." (RySG)	**Active**	ICANN thanks the Registry Stakeholder Group for this feedback. Going forward, ICANN commits to increase transparency surrounding the handling of public comments on this project by documenting the response to or action resulting from each public comment, using this tracking form (same response as to item 2.1 above).	
2.3 "The changes made to the proposed indicators better capture non-technical stability than ICANN's previously proposed metrics, which were primarily technical in nature." (RySG)	**Active**	ICANN thanks the Registry Stakeholder Group for this feedback.	
2.4 "ICANN has decided to move forward with creating the Beta Marketplace Health Index but has not yet created a meaningful dialog that would permit a consensus to be reached among various stakeholders impacted by the index. Thus far, ICANN has requested public comment on their initial gTLD Marketplace Health Index Proposal. Following this initial round of comments, ICANN convened an advisory panel where they presented a revised draft to the panelists who each individually sent additional feedback to ICANN. ICANN did not disclose to the members of the advisory panel how the feedback that panelists provided would be addressed. Instead, ICANN's staff seems to have relied solely on recommendations from its funded research, which was edited and reviewed by ICANN staff alone. The resulting Beta report therefore lacks clarity around goals – as noted in the community feedback -- and continues to arbitrarily define an industry marketplace that does not reflect end users' experience nor the actual marketplace in which TLDs compete." (VS)	**Active**	ICANN thanks Verisign for this feedback. Looking ahead, ICANN commits to documenting its response to or action on each public comment or formal Advisory Panel input received on this project. ICANN will begin this round of Advisory Panel work with a discussion surrounding goals and processes for achieving agreement on refinements to the Index.	

2.5 "ICANN has not obtained consensus that this initiative is leading to a meaningful outcome. This is the second comment period on the topic and a volunteer-based advisory panel was also convened. Thus far, ICANN has selectively addressed comments from the first round and not directly responded to comments raised during the advisory panel. The economist that was retained worked exclusively with ICANN staff to develop his paper. In the paper, Professor Bhargava indicated that multiple reviews were conducted with revisions being provided: "After preliminary review and discussions, this draft was revised as well as annotated to provide a more elaborate description and justification of the metrics, including associating each metric to one or more decision elements." The paper was only presented to the advisory panel in final form as a notification that the study had been completed and was going to be published but ICANN did not provide the panel with any opportunity to provide input to the paper. For example, a proper economic evaluation should be open to peer review but we have no indication that this was done with Professor Bhargava's paper. While engaging an economist to support this effort may be beneficial, ICANN should allow a proper economic evaluation to be performed without presumptions at the outset as to what a "healthy" marketplace may be. Similarly, an economic analysis should not be limited to only those metrics which are conveniently available. Such limitations will likely yield an unreliable and potentially misleading Index. The process of developing this initiative thus far has not led to a community consensus and instead appears to present only ICANN staff's perspective on the marketplace." (VS)	**Active**	See action items listed in item 2.4 above.	
2.6 It might also be useful to point out that metrics were defined based on (not just on the 3 category definitions) - but also with a clear sense that (1) only with respect to data available with ICANN and (2) not to make judgements but to allow diverse stakeholders to evaluate and make their own judgements. (Hemant Bhargava, APCall1, chat at 11:27)	**No Further Action Needed**	ICANN appreciates Prof. Bhargava reminding the Panel of this point during the call. This was read out loud to the group.	Resolved.

3) Category C: Metrics Development Process-Future		
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
3.1 "I would suggest taking note of all the comments submitted previously and this time, and outsourcing the entire project to CENTR https://www.centr.org/ and/or the Internet Society http://www.internetsociety.org/ or some other entity competent to do the job." (JP)	**Active**	Looking ahead, ICANN commits to documenting its response to or action on each public comment or formal Advisory Panel input received on this project.	
3.2 "We appreciate ICANN's indications that the Index will be an ongoing project and look forward to further discussion on the matter both through RySG participants on the Advisory Committee as well as wider community engagement." (RySG)	**No Action Required**	ICANN appreciates this feedback and looks forward to working with the RySG and the broader community in further developing this project.	
3.3 "The BC reiterates its desire that the most appropriate factors be used, despite the fact that they may not be the most easily available, and despite the fact that the data may not currently be collected by ICANN." (BC)	**Active**	This recommendation will be noted in communications to the Advisory Panel. It is expected that subsequent versions of this Index will include broader sources (possibly external) of data than that used for the Beta version.	
3.4 "Use weighting and filtering to prevent large entities from dominating results, to make KPIs more useful by pinpointing potential problem areas." (BC)	**Active**	This suggestion will be noted in communications to the Advisory Panel.	
3.5 "Rather than continuing to request comments on specific metrics that have been compiled by staff based upon available data, ICANN should develop a process to lead the community through developing a mutually agreed upon set of goals for a marketplace health index. Once these goals are collectively agreed upon, then data to characterize progress towards those mutually agreed upon goals can be collected. If the advisory panel is going to be the mechanism for establishing these goals, a process for reaching consensus within the panel and eventually the broader community should be clearly outlined." (VS)	**Active**	ICANN appreciates this feedback and has added it to the list of preliminary discussion topics for the Advisory Panel.	
3.6 "Regarding the attached "An Economic Evaluation of gTLD Performance Metrics" report from Dr. Bhargava of UC Davis, we are in agreement with the Caveats and Next Steps named in the report, for points on which ICANN should be mindful, and for recommendations of changes to be made. We especially make note of the statement of caution regarding interpreting results in Section 4 - Summary and General Observations, and the importance of measuring across time, and suggest that these be accounted for in future versions of the report, and communicated to the report's audience." (BC)	**Active**	ICANN appreciates this feedback and has added it to the list of preliminary discussion topics for the Advisory Panel.	
3.7 Is there an appeals process for final disposition? (Ivan Rasskazov, APCall1, 11:17 chat)	**Active**	ICANN appreciates this question. As noted during the APCall1, the process for handling disagreement among the Advisory Panel will be discussed. Staff proposes that if a definition, topic, or particular metric(s) are particularly contentious, we should consider seeking broader input on it to ensure a fully-informed decision is reached.	

4) Category D: Publication Frequency			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
4.1 "INTA would also suggest that the Index be published more frequently than twice per year, given the importance of this information in monitoring marketplace trends and identifying possible areas of concern." (INTA)	**Active**	ICANN appreciates this feedback and has added it to the list of preliminary discussion topics for the Advisory Panel.	
4.2 "We note that the intended frequency of publishing is twice each year until v1.0. The BC is interested in knowing the intended frequency ongoing, and again suggests targeting 'quarterly' as the desired frequency of reporting." (BC)	**Active**	ICANN appreciates this feedback and has added it to the list of preliminary discussion topics for the Advisory Panel.	
4.3 "Publish reports quarterly. Incorporate period-over-period trend data." (BC)	**Active**	ICANN appreciates this feedback and has added it to the list of preliminary discussion topics for the Advisory Panel.	
4.4 "The other quesiton is how frequently will this index/data repository will be updated? That may help decide what is practical to include as well." (ICANN57_work (chat) Ivan Rasskazov: (10:17))	**Active**		

5) Category E: Report Design/Features			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
5.1 "Introducing a set of defined terms within the Index would also enhance its utility and accessibility for those not closely engaged in the day-to-day work of ICANN." (INTA)	Active	ICANN thanks INTA for this suggestion. The Index (Beta) contained a limited glossary, but there are many terms used in the index that were not defined in the glossary, but could have been (such as "family" and "distinct"). ICANN will include this in the list of topics to discuss with the Advisory Panel.	
5.2 "We note that the report is a presentation of mainly graphics/charts/figures—and is somewhat light on clarifying statements, explanations, definitions. We look forward to seeing more explanatory text in future versions. Also, figures will benefit from more explanation of inputs, calculations, and results." (BC)	Active	ICANN appreciates this feedback and has added it to the list of discussion topics for the Advisory Panel.	
5.3 "Some calculations in the report are provided with pinpoint precision while others are not. We suggest maintaining consistency across classes of calculations. For example: "These data are presented at a 95 percent confidence interval with an estimated percentage plus or minus approximately two standard errors," is the label for only one of the graphs--Accuracy of WHOIS Records. By contrast, "Second-Level Domain Name Additions in gTLDs: Year-Over_Year Growth Rates (2010-2015)" includes percentages rounded to both a tenth of a percent and a hundredth of a percent, and with no note about deviations or means, or why two different rounding schema are used in a single graph. Consistency where possible will add to the readability of the report and decrease opportunities for confusion." (BC)	Active	ICANN appreciates this feedback and has added it to the list of discussion topics for the Advisory Panel.	
5.4 "A more diverse color palette for the report's figures will allow distinction of categories and distinction of inputs across figures. For example, in Figures 12 and 13, the color used for new gTLD additions is the same color used in Figure 16 for domain name deletions. Consistency of color schemes across figures can be achieved with a broader color palette and will result in greater readability and comparison of data across figures." (BC)	Active	ICANN appreciates this feedback and has added it to the list of discussion topics for the Advisory Panel. ICANN will also keep this feedback in mind when the time comes to design the next publication of the Index.	
5.5 "One test of the gTLD Marketplace Health report should be its utility. Inherent in its utility is that the report's audience understands how to use it, and does not misinterpret that data. To this end, we recommend including solid definitions of terminology. Defining the inputs will be helpful to knowledgeable readers, as well as make the document more understandable those among the audience who are less knowledgeable. It would be useful to have names of Figure(s) in addition to or in lieu of page numbers when referencing content elsewhere in the document." (BC)	Active	ICANN appreciates this feedback and will include it in discussion topics for the Advisory Panel.	
5.6 [*Regarding the gTLD Marketplace Health Index (Beta) glossary*] "Suggest improving the definition of IDN. Current definition does not account for what makes IDNs distinct. • Suggest improving the definition of Geographic gTLD, or provide pointer to inline definition. • Suggest improving the definition of gTLD registrar. (An uneducated reader, the UC Davis author, used the existing definition to confuse "registrar" and "registrant.") • Suggest improving the definition of "registry," to present it as more than a database, as well as to distinguish between registry, registry operator, operator family." (BC)	Active	ICANN appreciates this comment. ICANN will include this for discussion with the Advisory Panel.	

6) Category F: Outside Experts			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
6.1 "INTA also welcomes continued exploration and input from academics and others who are able to provide more specific insight from various industry sectors such as information technology and economics that would further enhance the utility of the Index." (INTA)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	
6.2 "We note ICANN's inclusion of an information technology management academic and see the opinions and input as useful, and suggest that the development of this report continue with input from disciplines such as economics and statistics as well, as application of related disciplines to these marketplace metrics will likely improve the baselines and usefulness of this report going forward." (BC)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	

7) Category G: General Structure of Metrics Framework

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
7.1 "The BC mainly agrees with the factors named for determining health in the areas of competition, stability and trust, with the expectation that ICANN will continually seek to improve measures and calculations and inputs with each publication of the Index." (BC)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	
7.2 "As stated in comments by the advisory panel, it is clear that substantial work is necessary to establish and understand the goals of a Marketplace Health Index. Nearly every commenter in the original round of public comments expressed concern around the scope and process of the intended health index. The sheer diversity of the recommended metrics that commenters have suggested indicates at a minimum that the goals of the Index are simply too broad. To make achieving consensus around the Index possible, the scope of what this index intends to cover needs to be defined clearly and the process for reaching consensus must also be described in more detail." (VS)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	
7.3 "Other useful items in the UC Davis report which we recommend using are: - Principles for metric design - Suggestion to evaluate if the metrics capture relevant factors - Suggestion to push more sophistication re: measurement, normalization into subsequent phases" (BC)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	
7.4 "It looks like a set of mutually dependent but exclusive parameters (trust/usage/development/stats). A single figure or index might not work well." (ICANN57_Overview (chat) John McCormac - HosterStats: (09:51)).	**Active**		

9) Category I: Marketplace Stability (Scope and Definition)			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
9.1 "As to the [draft metric definition "More gTLD registrars and gTLD registry operators are entering the gTLD marketplace than are leaving"], Donuts does not believe this is necessarily an indicative metric. For example, within a six-month period (the frequency proposed for marketplace health updates), it's conceivable that NO provider enters or exits the market, but that gTLD usage still grows steadily. Or that another helpful metric—perhaps penetration in traditionally underserved regions—shows growth. An increase in market participation by providers is a laudable goal, but in isolation, such a metric has the potential to be misleading." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
9.2 *(Regarding the definition of "marketplace stability" in the gTLD Marketplace Health Index (Beta))* "The same caveat regarding lack of metrics applies to the starred item in the second bullet here. Donuts again is concerned about the vague nature of this definition; while service providers generally do consistently set and meet expectations for service levels, beyond tools such as service level agreements (which are very specific and technical in nature), it's unclear how (if at all) ICANN could either point to or develop measurements that would be a reliable representation of "stability" in this context." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

10) Category J: Trust (Scope and Definition)

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
10.1 (*Regarding the definition of "trust" in the gTLD Marketplace Health Index (Beta)*) "Donuts repeats its reservation about perceptions. Donuts agrees that compliance with contractual obligations is a useful and necessary metric (though it's doubtful that this is a metric indicative of trust outside the industry—consumers and end-users generally are not literate with ICANN contractual compliance matters)." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
10.2 "The definitions for both trust and stability need to be defined relative to the audience that needs to trust the marketplace and perceive it to be stable. Evaluating metrics as they relate to trust and stability without a clear audience defined is not possible and will not yield meaningful or reliable data. The ambiguity of the current definition allows one to conclude that the metrics are measuring whether ICANN has created a stable set of vendors that it can trust. If the desired goal is to evaluate the perspective of any others in the marketplace, such as domain name users, then the metrics need to be changed to be far more comprehensive." (VS)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

11) Category K: Relevance of Physical Address to Marketplace Health

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
11.1 "You are measuring such metrics as "geographic diversity" which may be irrelevant or invalid for reasons I discussed in my earlier comment and which your "expert" Professor Hemant Bhargava also cited. We live in a global economy. GoDaddy and other registrars do business worldwide via the internet. Wake up ICANN, it's the 21st Century! (Get out of your "hub" mentality and into a "global" mentality.)" (JP)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.2 "We believe that shortcomings persist in the revised Index's treatment of Geographic Diversity. For instance, the indicators used to measure registry and registrar service offerings remain overly simplistic, simply counting the number of jurisdictions with an ICANN accredited registrar and registrar." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.3"Similarly, while we believe that geographic distribution of registries and registrars by region is an important metric that should be taken into account, the current presentation overstates its relationship to competition as many registries and registrars compete transnationally." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.4"INTA supports the envisaged expansion of these metrics to account for additional contracted parties on a country-specific basis. As a result of the new gTLD program, geographic diversity of both registry operators and registrars has increased, as reflected in the Index, which has had an impact on the ability of brand owners to pursue legal action under the Anti-cybersquatting Consumer Protection Act (ACPA) and other U.S. laws designed to remedy direct and vicarious trademark infringement, as well as inducement, within the DNS." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.5"Donuts echoes it's May 2016 input: It's a worthy goal to have a geographically meaningful distribution of registry operators, but the absence of operators from a particular region does not necessarily indicate the overall health of the marketplace or of penetration of users in a particular geography. The mailing address of operators in various jurisdictions clearly is not an indicator of usage of those providers' products and services in other jurisdictions." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

11.6 "The BC recognizes these results as a strong start for this category, agreeing that inputs are currently not reflective of reality within regions, but provide a good beginning view intra-regionally. In addition, it is noted that this measure is for physical presence in a marketplace that is primarily virtual. We look forward to subsequent reporting that strives to account for this factor." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.7 "[W]e find the the indicators for Geographic Diversity to be rudimentary. As acknowledged in the report, many Registrars serve and target markets outside of their own jurisdiction, as well, this measure should take into account the numerous countries served by the re-sellers of wholesale registrars. We would encourage ICANN to dig further into potential measures for diversity." (RrSG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.8 "Both metrics presented for registrars and registries appear to be focussing specifically at the offering (how many suppliers there are), rather than the market take-up. Focussing on the offering does not allow for detection of undue market domination." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.9 "While it is probably beyond ICANN's remit to analyse the actual geographic diversity of gTLDs, the concentration on registars per country or ICANN region can be a misleading way of measuring geographic diversity. This is because each country will have a percentage of registrants using the services of registrars in other countries and some registrars are not actually based in the countries that they have listed on their ICANN registry record. " (JMcC**)**	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.10 More relevant than location is whether a registrant can find a registrar website in their own language and script (and language and script together, not separately, need both). (ICANN57_work, Steve DelBianco, ~1:03)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
11.11 Where a registry/registrar is physically located (maybe not where it is incorporated) is important because they may tend to do outreach in those areas. (ICANN57_work, Kathy Kleiman ~1:13)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

11.12 I agree, don't stop tracking where they are located, but don't stop there. (ICANN57_work, Steve DelBianco, ~1:14)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

12) Category L: Registrar Locations

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
12.1 "As captured in our previous comments, a registrar may provide high-quality service and compete effectively across many jurisdictions beyond the one in which it is based provided that language, legal, payment and other issues particular to that jurisdiction are taken into account." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
12.2 "The current graphs show a simple metric of geographic diversity of registrars across regions and their development against time. The metric itself shows neither a conclusive growth nor a reduction in offering. It does show an ongoing imbalance worldwide – and this is helpful. However, this metric appears to lack differentiation among the registrars. Indeed, the Generic Top Level Domain offering varies greatly across Registrars. It is a trivial way to compile these statistics by treating a registrar that exists as a service to its own clients of other services in the same manner as a general registrar that derives most of its income from registering domains. See under "Competition" for suggestions on more metrics." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
12.3 The percentage of distinct ICANN-accredited registrars by region makes for a pretty picture but some ICANN registrars may not actually be based in those countries or regions. Some registrars use companies in other countries for tax and administrative purposes. The companies have not physically moved their base of operations. The percentage of distinct ICANN-accredited registry operators in ICANN regions or countries is also affected by this domicile issue. (It may be possible for ICANN to request a periodic report on the number of domains under management grouped by WHOIS record country name from registrars but that may require the cooperation of registrars and a possible amendment to the RAAs. It would provide a more accurate view of the geographical distribution of gTLDs.) **(JMcC)**	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

13) Category M: Registry Operator Locations			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
13.1 "The jurisdiction is even less relevant when applied to registries, as the registry operator is not generally the primary party engaged in customer support, payments, or other interactions that are highly affected by jurisdiction." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
13.2 "The selected method for representing registry geographic diversity is based on the ICANN contact address. The stated goal of selecting this metric is to measure whether "Diversity exists in the choice of a service provider." The context for who's choice should be diverse is not scoped in the goals. Measuring the registry operator's address may be interpreted as a way to indicate where registry operators are able to be successful but it does not effectively measure where registrants and domain users do and do not have choice. One example of this is the new gTLD, .DESI. This is a registry that according to their own goals is a TLD which seeks to be "The worlds first domain that celebrates the global community of 1.7 billion desis." The registry operator, Dot Desi, LLC, is based in Bethesda, Maryland. The registry operator, which is interested in serving desis, has chosen to be based in the United States and according to this metric would count as a United States based registrar. To determine whether or not this is the correct metric, the scope of the goal needs to be more clearly defined." (VS)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
13.3"The same comment can be made for registries. Again all registries are treated in the same way, whether they are catering to a community, a brand, a service, a generic name, a geographic location, etc. There needs to be more detail for this metric to be useful." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

14) Category N: IDNs			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
14.1 "We appreciate the steps taken in the current version of the Index to provide a wider range of statistics related to internationalized domain name (IDN) adoption than the previously proposed approach of counting how many registrars offered IDN registrations." (RySG)	**No Action Required**	ICANN thanks the RySG for this feedback. This was not included in the Advisory Panel "discussion topics" document because there was no action item or qualifying statement that would limit its application.	

15) Category O: Total Second-Level Names in gTLDs

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
15.1 "We appreciate the additional metrics proposed to look at overall registration volumes and patterns in new and legacy gTLDs. Some further work may be required to contextualize these variables, particularly in the .brand context where registration volume does not map clearly to demand." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
15.2 "[Re: gTLDs – Total] This is a helpful metric." (DON)	**No Action Required**	ICANN thanks Donuts for this feedback. This was not included in the Advisory Panel "discussion topics" document because there was no action item or qualifying statement that would limit its application.	
15.3 "ICANN can refine its demonstration of year-over-year growth rates with the addition of the number of new TLDs released in each time period. This would more precisely demonstrate the consistent pattern of strong initial registration growth (due to pent-up demand), followed by a leveling off in rates of growth in subsequent years." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
15.4 "Definitions are here for H1, H2 which are abbreviations used earlier in the report. Suggest defining abbreviations on first reference. Figure 7 - Description is for "total number…in existence," and graphic is for "number of registrations"—174 million. With approximately 326 million current registrations in existence today, this graph shows 174 million registrations after H2 of 2015, with no explanation for the disparity. Also, there appears to be no view in the report of renewals vs. initial registrations, or separation of .com vs other TLDs." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
15.5 "The economic evaluation that ICANN commissioned identifies market prices, internet users' uptake, gTLD recognition, ICANN policies, time, market demands, application windows and other marketplace factors as factors that may influence the selected metrics. The beta index fails to appropriately acknowledge these limiting factors. The economic evaluation needs to be performed on whether or not "growth in new gTLDs and across all gTLDs" is actually a legitimate way to measure marketplace health. The paper that Professor Bhargava provided ICANN with appears to have taken ICANN's direction for what makes a healthy marketplace and the professor was limited to evaluating whether a provided set of metrics achieved the ICANN-provided definition." (VS)	**Active**	ICANN appreciates this feedback and has included it in discussion topics for the Advisory Panel.	

16) Category P: Second-Level Adds/Deletes

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
16.1 [Re: gTLDs – Additions and Deletions] This too is a useful set of metrics. However, Donuts again repeats its comment from May 2016: It would be a more meaningful and detailed metric if, along with this data, re-registrations of deleted names also were calculated, as sometimes this is a significant number." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
16.2 "Similarly, on page 7 of the presentation, we suggest the addition of text to the "Second-Level Domain Name Additions: IDNs, .brands, Geographic" graphs that would explain these TLDs were launched in late 2014 and early 2015 and thus would have experienced the same phenomenon. These representations otherwise mistakenly project these TLDs as otherwise unhealthy." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
16.3 "It appears that there is a typo in the following sentence, with the second instance of the word "deleted." "Second-level domain name deletions in 2014-2015 are shown (on page 9) as a percentage of total second-level names deleted in each category." Figure 14 - Suggest adding words to the title for agreement with the title of Figure 15 and easier comparison of the two. Figure 17 - Some figures present numbers that are (meant to be) relative to each other. Some are relative to a total number that is not named. (This confusion may be due to a typo in the last paragraph on page 6.) But it requires a closer look to get clarity. Suggest adding text that makes the visuals more reader friendly, as in the explanation for Figure 19, for example. Figure 18 - It appears that some figures are relative to each other, and that some are relative to a total number that appears to not be named. This confusion may be due to a typo in the last paragraph on page 6." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
16.4 "The graphics showing the second level domain name additions and deletions in gTLDs on pages 6 to 9 are helpful. The ALAC proposes that a single graph should show additions and deletions using the same axis (in other words, merging Figure 11 and Figure 16)." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
16.5 "Separate .com from other gTLDs in reports of numbers of registrations, deletions." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
16.6 "The new gTLDs are in a very different market phase to these older gTLDs and the promotion of some new gTLDs with heavily discounted or free registrations makes their comparison with legacy gTLDs somewhat problematic in that many newly launched new gTLDs have no historical (veteran registrations that are over one year old) registrations. The rise of deletions and falling renewal rates are products of discounting and increased competition in the marketplace." (JMcC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

17) Category Q: Registry Operator/Registrar Families

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
17.1 "While the Index helpfully provides information regarding the "distinct entities in the gTLD marketplace," it would be helpful to provide more granular detail regarding affiliations between various entities. INTA notes that certain entities have used affiliates to conduct abusive activity in the DNS while preserving the appearance of integrity from other affiliates or parent companies. This kind of activity, and shell games such as these, erodes trust in the gTLD marketplace, and in ICANN's ability to conduct adequate due diligence regarding potential new registry operators and registrars applying to operate new gTLDs or register domain names therein." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
17.2 "Donuts appreciates ICANN considering its and others' input and consolidating registry and registrar families. We do have a concern here, however: Will ICANN presume that only growth in these numbers will indicate marketplace health? It may be, for example, that the industry enters a period of consolidation, where the absolute number of providers decreases, but products, services and marketplace penetration expand. Alternative points of reference in such instances could be useful, and we encourage the advisory panel to consider their development. Also, we reiterate our input from May, when we stated that "family," in the context of a registry, is not defined—that is, does it include provider-client relationships (whereby a provider manages key registry functions for, say, a variety of single TLD providers)?" (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
17.3 "In calculating the metrics, each gTLD registrar or gTLD registry operator family is counted once, then added to the number of independent gTLD registrars or gTLD registry operators. It is desired that Competition reveal registrar and registry operators operating independently vs. part of larger families with a corporate parent, the latter of which ICANN's infographics provide." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
17.4 "In the CCTRT, we are discovering we need a little more nuanced analysis to measure thse things such as market concentration instead of just raw numbers of backend providers, for example." (Jonathan Zuck, APCall1, chat at 11:32)	**Active**	ICANN appreciates this feedback, which was read aloud to the Panel during the Oct. 26 call. This topic will also be revisited with the Panel when we reach this specific topic.	

19) Category S: Trust Category			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
19.1 "We maintain our previous position that the indicators being considered by ICANN (UDRP/URS decisions and WHOIS Accuracy) are so narrowly targeted that they would be unlikely to have a direct, measurable impact on overall trust in the gTLD marketplace or be perceptible to the average registrant. The measure of syntax accuracy, which suggests that the registrant is still fully contactable, seems particularly misplaced as a measure of overall trust. We advise that ICANN abandon these niche metrics in favor of user impact surveys until a direct linkage between these measures and overall trust can be established." (RySG)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
19.2 "INTA is pleased to see that "trust" in gTLDs is broadly defined to include not only registry operators, but also registrars, service providers, and registrants, and that the subject involves both compliance with contractual obligations as well as consumer perceptions of trustworthiness." (INTA)	No Action Required	ICANN thanks INTA for this feedback. This was not included in the Advisory Panel "discussion topics" document because there was no action item or qualifying statement that would limit its application.	

20) Category T: UDRP/URS Decision Metrics

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
20.1 "In addition, INTA agrees that the number of UDRP and URS complaints decided against second-level gTLD registrants (annual total plus percentage of cases filed) is also a helpful metric for evaluating trust.14 It would be more helpful to separate out UDRP versus URS cases in the reported data, given the different burden of proof standards required under each procedure (namely, preponderance of the evidence versus clear and convincing evidence, respectively), and the impact that difference may have had on the percentage of decisions decided against registrants (including potentially its relationship to the drop in the complainant success rate as of 2014)." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
20.2 *[Re: the Number of UDRP/URS Decisions against gTLD Registrants metric]* "It is important to understand and document the fact that URS does not (yet) apply to disputes in the .COM and .NET gTLDs, where the majority of infringement occurs. Accordingly, stakeholders could improperly perceive that disputes are disproportionately occurring in new gTLDs, an unfair perception and contrary to ICANN's ongoing duty to maintain a level playing field. Accordingly, it would be useful if ICANN were to account for this discrepancy without conflating the two and reporting UDRP and URS statistics in absolute numbers for each." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
20.3 "For the sake of clarity, consider including an introduction explaining what the figures in this section of the report are intended to communicate. The "Number of UDRP and URS Decisions Against gTLD Registrants" figure and the introduction are descriptive and useful. Suggest keeping this figure as-is." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
20.4 "A line/bar graph, rather than a pie chart, would be more helpful for the percentage of UDRP and URS Decisions against gTLD Registrants." (ALAC)	**Active**	ICANN appreciates this feedback and has made a note of it to consider when this report is updated.	

21) Category U: WHOIS ARS Metrics

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
21.1 "INTA appreciates the data provided regarding WHOIS accuracy, although additional detail regarding the number of WHOIS accuracy complaints would be helpful to contextualize the data presented. Regardless, INTA is concerned that over a third of WHOIS data is both syntactically and operationally inaccurate. INTA understands that the community is engaged in policy development to overhaul the current WHOIS system, including means of improving data accuracy, and will continue to participate in that work to try to develop solutions for improving registration data accuracy. In the meantime, INTA would encourage ICANN and the community to try to develop and enforce interim solutions for improving the syntactic and operational accuracy of data in the WHOIS system, including mandatory field input requirements for registration data (i.e., all email addresses should have an @ symbol in them), incentives for registrants to provide accurate data (i.e., tying rebate programs to accurate registration data) and for registrars to verify such data, and penalties for failures to provide or verify accurate data." (INTA)	**Active**	ICANN appreciates this feedback and has included portions relevant to this specific project in discussion topics for the Advisory Panel.	
21.2 *[Re: the WHOIS ARS metric]* "Donuts remains concerned that this statistic is not reliable. The Whois ARS is a new technology still being developed and refined—just recently, an error with the ZIP code accuracy process was discovered. The resulting changes yielded significantly different numbers. While we appreciate taking our previous comment into account (that if the Whois ARS data is to be used, the +/- standard deviation and error rate of measurements reported must also be published), we continue to believe the accuracy of the reporting system is insufficient for use in the index at present." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
21.3 "Figures 22 and 23 are presented with inclusion of standard deviations. The additional specificity may detract rather than add to the message provided by the graphs." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
21.4"Otherwise, this section of the document is a model for other sections—it is highly informative, providing explanations for the graphs in language that is easy to understand. Exceptions are the inclusion of standard deviations - unsure if anyone intends to scrutinize this closely on the Beta - matches in color scheme but is otherwise unlike the other graphs w/presence of standard deviation measures - use of SME statistical terms accompanying superfluous information is inconsistent and a distraction." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
21.5 "Rather than as a pie chart, a line/bar graphic showing the ongoing accuracy on a quarter by quarter basis would be more helpful. Furthermore, it would be interesting to see WHOIS accuracy trends on a per top level domain basis." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

22) Category V: Compliance Termination-Related Metrics			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
22.1 "As noted above, INTA would appreciate additional detail regarding registrar de-accreditation, including primarily the reason(s) for either voluntary or involuntary de-accreditation. As the Index suggests, this is a matter of consumer trust as well as a matter of marketplace stability and competition." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
22.2 "Furthermore, it would be interesting to note why registrars are, voluntarily or involuntarily, deaccredited. Was that due to high ICANN fees, noncompliance/legal issues, technical incompetence, lack of interest, etc?" (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

23) Category W: Marketplace Stability--Scope

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
23.1 "We note that marketplace stability is reported as a measure of the number of gTLD registrars accredited and de-accredited over multiple periods. There is no reporting of marketplace dependencies and vulnerabilities." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

24) Category X: Accreditations/Deaccreditations			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
24.1 [Re: gTLD Registrars – Newly Accredited] "This is an interesting statistic, but is not an indicator of "marketplace security." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
24.2 [Re: gTLD Registrars – Involuntary Terminations]* "Donuts is pleased to see ICANN staff give credence to input that requested de-accreditations be broken out and documented as due to non-compliance. However, it also would be helpful, and more informative, to denote other reasons for de-accreditation that are not due to inappropriate reasons (for example: acquisition and consolidation)." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
24.3 "It seems that voluntary vs. involuntary de-accreditations will be difficult to separate, as abandonment and failure to pay fees can constitute an intentional opt-out." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
24.4 "Figure 20 - The accompanying note states that a figure with measures for gTLD registry operator terminations is not included because the number is zero. As this Beta is as much about format as results, suggest making a place in the report for it anyway, so that when numbers are greater than one, the community knows that this will be reported. Also, the note states both that this "would normally be reported," and also that ICANN will "consider publishing" the registry metric if numbers are greater than zero. A firm commitment to publish these numbers is suggested. Note that, in the case of registrars, ICANN terminates accreditation agreements and in the case of registries, the registry operator terminates the agreement with ICANN. Both appear under the heading entitled "Involuntary Terminations." Suggest defining de-accreditation vs. termination. Suggest defining the term "registry operators," as some readers may confuse the term with backend registry operators." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
24.5 "Secondly, as also pointed out by the Registries, the number of de-accredited Registrars tells us almost nothing without some sense of scale of the registrars involved. Again we would encourage ICANN to find more robust metrics for this area." (RrSG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

25) Category Y: Additional Proposed Competition Metric—Registration Numbers			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
25.1 "[You should be publishing] corresponding registration numbers, for each and every TLD in the global DNS if you are indeed interested in "Marketplace Health")." (JP)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

26) Category Z: Additional Proposed Competition Metric—Market Share			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Dispositon**
26.1 "While the trends in registry and registrar market concentration are interesting to follow, we believe that the metrics being used are of limited value as they do not account for overall market share across registry and registrar families. We believe that a closer look at the share of registrations across the major registry and registrar families is necessary to get a sense of the concentration of the market." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
26.2 "True competition in a market is not solely a measure of the market offering but it also revolves around the share of market from the leading competitors. An example of such statistic, solely for new gTLDs is shown on https://ntldstats.com/registrar." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
26.3"Looking at the overall domain name market, a metric tracking share of market, such as the one shown on http://www.domainstate.com/registrar-stats.html is much more suitable to show whether competition among registrars is being stimulated. It appears that so far the vast majority of the market is dominated by one major player. When it comes to the domain registrations on a per country basis, the statistic shown on http://www.domainstate.com/top-country-registrars.html speaks for itself." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
26.4"When it comes to metrics about registries, whilst there is some worth in compiling the metrics presented, a better metric would be to track the market share of gTLDs, as on http://www.domainstate.com/registrar-tldbreakup.html." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
26.5"The metric presented are very useful. However, as seen in the "Competition" section, it is not just how many new players do we have (registries and registrars) but the market share of each one, for different TLDs or families of TLDs. And symmetrically, the count of the number of TLDs should include their market share too. In addition, statistics per country/region would be welcome in Figure 19." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

27) Category AA: Additional Proposed Competition Metric—gTLD Usage			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
27.1 "Rightside believes that usage of a TLD is an important data point to monitor and study and this key element does not seem to be included currently as part of the MHI. We believe that domain name usage is a better indicator of long-term viability of a TLD than renewal rates. Rightside defines "usage" as any domain name registered in a TLD, excluding domains that do not resolve or are "parked" for monetization of traffic using advertising." (RIGHT)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
27.2 Chat recommendations re gTLD usage data from Oct. 26 AP call, chat transcript times as marked Michiel: (11:43) I would advocate including usage percentage in the market shares. This can be done by means of a crawler. John McCormac - HosterStats.com: (11:44) web usage measurement is a bit more complex than using a simple crawler Michiel: (11:44) E.g. in The Netherlands: .com has 2 million domain names, but only 50% is used (website), .amsterdam 25.000, but 90% is used (website) Katrin Ohlmer | DOTZON: (11:44) +1 Michiel Jonathan Zuck: (11:45) agree John McCormac - HosterStats.com: (11:45) No. The web usage in .amsterdam is nowhere near 90% Ivan Rasskazov: (11:45) .Amsterdam is closer to 13% usage once you factor out dynamic parking pages Michiel: (11:45) but is usage a relevant criterium? John McCormac - HosterStats.com: (11:46) usage can be used to predict renewal rates Ivan Rasskazov: (11:47) It is also consumer adoption which is likely to predict long term success of the TLD.	**Active**	ICANN appreciates this active discussion and will revisit these comments with the Advisory Panel.	
27.3 Another factor that would really show health is the relationship between registrations or the inventory of domain names and WHOIS requests. That would be of interest. (ICANN57_Overview Thomas Keller, ~1:04)	**Active**	ICANN appreciates this active discussion and will revisit these comments with the Advisory Panel.	

28) Category AB: Additional Proposed Competition Metric—Registrant Information			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
28.1 "Rightside also believes other metrics have bearing on marketplace health and should be included in any TLD study including: Concentration of registrants per TLD (i.e. how many domains per registrant are registered in the TLD, or registry level); and Average number of years of registration length per TLD." (RIGHT)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
28.2 "We urge a more that looks at the dispersion of registrations (by registrar and registry) within particular jurisdictions around the world, to see whether these providers are competing effectively and registrants are being offered widespread choice in registry and registrar regardless of where they reside." (RySG)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
28.3 "A more meaningful approach would be to measure domain registration volumes across different countries and then to cross-segment this data by registrar and by registry and study the distribution. This would better capture overall global market penetration, whether providers were competing effectively in these marketplaces, and whether registrants were offered widespread choice in service provider, regardless of where they reside." (DON)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
28.4 "All in all, consumers (registrants) are the factors that move the market – the ones who pay – so we should find ways to get more insight on their needs and behaviours. This should be taken into account for future developments." (ALAC)	Active	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

29) Category AC: Additional Proposed Competition Metric—IDN Registrations/Dispersion			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
29.1 "[W]e continue to believe that if ICANN wishes to link overall IDN adoption statistics to competition, it should look at marketplace dispersion specifically in the sale of IDNs and whether this evolves as overall demand for IDNs grows or shrinks." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

30) Category AD: Additional Proposed Competition Metric—Pricing Data			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
30.1 "[Y]ou have ignored "pricing" as a key component of determining "Marketplace Health" you should be tracking, and publishing daily, wholesale and retail Pricing[…]" (JP)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
30.2 "This list is very thorough and will offer the community much to consider. However, as we did in our previous comment, Donuts urges against use of pricing as a metric in any scenario. ICANN is not a pricing authority and should not report on pricing in any format." (DON)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
30.3 "Stats about growth and deletions on pages 6, 7, 8 and 9 have to take into account pricing and market policies. Some registries offer domains for free or a very reduced fee. This significantly affects statistics and should be stated too." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
30.4 "ICANN data does provide some of this data (renewal numbers) and it is relatively trivial to generate spreadsheets or webpages from this data. Collecting pricing data from registrars and resellers is a bit more complex." (JMcC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

31) Category AE: Additional Proposed Competition Metric—Types of Registries			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
31.1 "For registries, it is worth noting that like-for-like gTLDs tend to compete against each other. For example, brand gTLDs do not broaden competition. A health related gTLD does not compete with a gambling related gTLD. So the true extent of competition is really amongst the more generic gTLDs, plus those that compete on a like-forlike basis in a specific trade." (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

32) Category AF: Additional Proposed Competition Metrics			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
32.1 "First, it would be helpful to capture additional metrics for measuring gTLD competition and the robustness of the gTLD marketplace, such as domain name renewal rates, new registration velocity, average registration and renewal prices at retail, and the number of accredited registrars per gTLD. It would also be helpful to distinguish between renewals and new registrations; to the extent this distinction is not already captured in the Index." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.2 "Second, in addition to the foregoing, it would be useful to measure how often non-renewed domain names are purchased by new buyers, and whether these result in trademark disputes." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.3 "Fourth, it would be helpful to present distinct data regarding domain name resellers versus registrars to provide a clearer picture of overall marketplace activity." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.4 "Capture direct competitiveness, robustness, other metrics in addition to renewal rate---new registration velocity, average pricing, ratio of registrar agreements per gTLD." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.5 "Review market share broken out across families" (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.6 "Distinguish between renewals and new registrations" (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.7 "Measure average pricing, pricing spread of actual sales transactions; average or relative number of sales per price point, as little price diversity can indicate a lack of competition" (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.8 "But just counting the number of registrations in gTLDs is not enough. For instance, other metrics like "Information Density of a TLD" or "Domains with DNS" may offer a more complete view. One really needs to dig a level deeper that tracks the actual use of a TLD. How do registrants use the domains? Are they in parking, for sale, without DNS? Are they used by individuals, associations, companies, or government agencies?" (ALAC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

32.9"We welcome consideration of the following topics that were raised by the BC in January 2016: Concentration index for gTLD registry operators and gTLD registrars (assuming that this denotes concentration around particular geographies, as opposed to some other type of concentration--like age or pricing schema) Additionally, the BC suggests that counts from registrar resellers are distinguished from counts from ICANN-accredited registrars themselves. Geographic distribution of gTLD registrants Original BC suggestion: Measure volume of new registrations across a country, then cross-segment by registry/registrar country to determine level of competition/choice. [*metrics proposed in the trust category summarized in "Trust" section, below…*] Capture net effect of resellers in the marketplace Note that this is listed in the report as two separate additional topics for community discussion, namely, "Percentage of second-level domain name registrations in gTLDs completed by resellers," and "Number/percentage of resellers broken down by ICANN region and/or legal jurisdiction." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.10"Despite not commenting earlier about the topics below, we note their inclusion in the Beta report and support the development of metrics for these items as helpful additions to the Index: • Survey data on perceived marketplace fairness • Percentage of gTLD registrars offering registrations in IDN gTLDs [*metrics in other categories reported in trust and stability sections below*] Average number of gTLD registrars offering a gTLD (average across gTLDs and broken down by category)" (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.11 ""Percentage of second-level domain name registrations in gTLDs completed by resellers. This is likely to be a problem as most registrars would not wish to give up such market-sensitive data. Even at a web hosting level, some of the larger operators prefer to include their reseller hosters with their overall market shares and totals. It is possible to build an approximate registrar share using other methods." **(JMcC)**	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
32.12 "Some of the geographical new gTLDs are not competing with other gTLDs or .COM but rather directly with the local ccTLD. As a metric, it does sound like a kind of Social Science number that would be nice to include in press releases." **(JMcC)** 32.13 It would be helpful to break down into different categories of registries (maybe 5? Open? Closed? Restricted? Etc? And then which TLDs fall into which bucket, and then how to we measure health by the agreement type. (ICANN57_Work, Gabe Fried ~47:00)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

33) Category AG: Additional Proposed Marketplace Stability Metrics			
Issue/Suggestion/Recommendation	**Status**	**Comments/Disposition**	**Final Disposition**
33.1 "The stability measures that look at deaccreditation would be more meaningful if they additionally looked at the number of domains under management by registrars that were deaccredited voluntarily or involuntarily to help scale the impact on the marketplace and on registrants. It goes without saying that deaccreditation of a registrar with thousands, or millions, of domains under management has a much more destabilizing effect than one with no (or few) domains under management." (RySG)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
33.2 Relatd to the Expansion of "Deaccredited" Metrics : "It may be helpful to separate out legacy gTLDs, including .com, .net, and .org, from new gTLDs in the data as well as brand gTLDs from new gTLDs with respect to the above trust-related metrics, among other data where it might be helpful to compare legacy versus new gTLDs trends and brands vs. other new gTLD trends." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

34) Category AH: Additional Proposed Marketplace Trust Metrics			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
34.1 "Accuracy of WHOIS records is reported, broken-out by Syntax Accuracy and Operational Accuracy. There is no reporting on WHOIS complaints or WHOIS reputation and/or trust." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
34.2 "RE: trust in the marketplace, separate .com from other gTLDs." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
34.3 RE: Perception of Risk: "While these metrics may sound somewhat nebulous, they can easily be measured as part of a well designed web usage survey. The problem is that some poorly designed surveys will categorise a site selling counterfeit goods as an e-commerce site so each site will need to be evaluated in its proper context. The measurement of the rate of abandonment also needs historical data. Web usage and development in a TLD is a form of trust in the TLD. The web usage in the new gTLDs is still at an early stage. (JMcC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
34.4 RE: Number of reported cases of phishing/spam: "Spam is also an issue that affects the perception of risk. The problem with a spam metric is that it can be quite an emotive subject for those affected and the registries. A more diplomatic way of predicting this problem might be for the registries to give a percentage of discounted registrations in the gTLD but this might be commercially sensitive information. Discounting promotions do appear as a derivative pattern in registration trends. (The rate of change of the rate of change on a registrar or hoster.)"(JMcC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
34.5 "INTA also encourages ICANN to consider including in the Index a number of the additional trust-related metrics set out for community discussion, including in particular: (i) The geographic diversity of gTLD domain name registrants (identifying and segregating proxy registration services); (ii) The incidence of reported phishing, cybercrime, and malicious activity; and (iii) The incidence of abuse, including but not limited to: • The number of abuse complaints against gTLD registrars involving malicious or abusive registrations. • The number of unique second-level domain names in gTLDs that had abuse complaints filed against them. • The number of second-level domain names in gTLDs suspended for abuse." (INTA)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

35) Category AI: Trust: Look Beyond ICANN Compliance			
Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
35.1 "Take into account all of the related actions that do not involve ICANN compliance." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	

36) Category AJ: Support for Metrics Proposed in gTLD Marketplace Health Index (Beta)

Issue/Suggestion/Recommendation	Status	Comments/Disposition	Final Disposition
36.1 "We welcome consideration of the following topics that were raised by the BC in January 2016: [*metrics suggested in other categories are reported elsewhere in this document*] Number of reported cases of phishing Incidence of cybercrime Incidence of abuse: – Number of abuse complaints against gTLD registrars involving malicious or abusive registrations – Number of unique second-level domain names in gTLDs that had abuse complaints filed against them – Number of times a response was made to a report of abuse." (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	
36.2 "Despite not commenting earlier about the topics below, we note their inclusion in the Beta report and support the development of metrics for these items as helpful additions to the Index: [*metrics supported in other categories are summarized under those category headings]* Number of gTLD registrar security breaches reported to ICANN • Number of complaints reported to ICANN regarding misleading information from gTLD registrars and resellers • Number of compliance issues with gTLD registry services detected by ICANN SLA monitoring system" (BC)	**Active**	ICANN appreciates this feedback and has included this in discussion topics for the Advisory Panel.	