

Community Comment 2
Public Comment Review Tool

1.6 Application Submission Period			
#	Comment	Contributor	WG Response
1	Also, regarding the period of application and posterior evaluation, it would be clearer if there were rounds of applications followed by evaluation periods, instead of a single continuous process. Another suggestion would be to announce either via a webinar or an open call for an application tutoring process prior to the submission dates.	NCSG	
1.6.1 - One of the overarching questions in Community Comment 1 focused on whether applications should be accepted during defined windows of time (also known as “rounds”). If the WG determines that a system of rounds is the right approach, is three (3) months an appropriate length of time to accept applications? What considerations should be taken into account when determining the length of the application window?			
1	4 (four) months is sufficient, provided ICANN announces the opening of the application window at least 8 (eight) months in advance AND, if ICANN promises to launch a new round with current rules (or new rules if implemented) every two years! Two years gives time to resolve contention sets etc. And a two year period is not so far out in the horizon that applicants will apply out of a fear of missing out and having to wait another 7-10 years before being able to apply again.	Jannik Skou	
2	We suggest a continuously available application system, eliminating the need for rounds entirely. A way to avoid potentially malicious attempts is to publish the applied-for TLDs immediately at their application and keep them on hold for 3 (or so) months (length as per 'rounds' windows suggestions) during which time a rival applicant may apply.	Demys	
3	We believe that the concept of an application window worked well in the previous round. We would agree that a three month window would be reasonable PROVIDED that the AGB2 is settled well beforehand and the window timing is publicised least 6-12 months before opening. If the process and AGB2 is only settled just before the window opens (seems likely given all previous experiences!) then perhaps a longer window will be needed.	Nominet	
4	With enough advance notice, a 3-month application period should be sufficient. We should avoid duplicating the “now or never” situation that occurred with the last round, and schedule rounds closer together. But we also need to balance the impact on ICANN staff in evaluating applications. We have learned much from the latest round and hopefully won’t run into as many situations that may cause delay.	BC	
5	Yes, 3 months is a reasonable application window, as long as ICANN provides reasonable notice (at least 2 months) before the application window opens. However, this would need to be on a regular and defined basis to provide predictability and assurance to potential applicants that wish to apply at a future date.	BRG	
6	While we do not agree with the concept of “rounds”, if ICANN were to use this model, 3 months should be an adequate time to accept applications.	Afililas	

7	The principal problem that would arise from a continuous process is that all applications would be treated on a first come first serve basis that would put some applicants for the same string at a serious disadvantage in comparison with wholly commercialised applicants with ready access to finance and human resources to develop a proposal quickly to gain first advantage. The process for resolving string contention by comparative evaluation and application prioritisation eligibility for example in the case of community-based applications, would not be practicable with an ongoing process, unlike in the case of a defined window for an application round. The three months window provided for the current round with adequate notice appears to have worked well.	GAC UK	
8	Allowing for subsequent procedures that contemplate a “rolling” first-come, first-served open period allows all applicants—now and future—the opportunity to apply when they want to. A continuous process will prevent bottlenecks in application processing and allow applicants to apply for a gTLD when it is right for their business, rather than when a short window allows. While we support a “rolling period,” we understand that there has to be a way to deal with contention for the same string if there is pent-up demand since the 2012 round. A hybrid approach might be considered by the Working Group (e.g. a short window followed by an immediate rolling period).	RySG	
9	See response to 1.1.1. Regardless if done in rounds or in “first come first served” continual application processes, At-Large is skeptical of the public benefit of ongoing gTLD proliferation. More information, such as the data being collected by the CCT-RT, needs to be collected in order to make an informed judgment regarding the benefit or harm caused to Internet user by further gTLD expansion.	ALAC	
1.6.2 - If we have a few next ‘rounds’ followed by a continuous application process, how should the application submission period be handled in the lead-up rounds?			
1	Applicants in the next round (regardless whether delegated or not) have priority over additional/subsequent round applicants.	Jannik Skou	
2	The sort of electronic submission process used for round 1 was quite complex but seemed to work. Once the window has closed then applications should be published and processed in line with the agreed AGB2. For rounds 3 and beyond ahead of a potential continuous application process then timing and any refinement of rules and processes necessarily needs to wait until round 2 has been processed, but we would suggest a target date of less than two years between subsequent rounds going forwards.	Nominet	
3	To provide predictability and help applicants plan more effectively, a timeline should be agreed. For example, an application window could be set to run annually (or more frequently) and the post-application-to-delegation steps can continue in parallel with any subsequent application window. This can continue until such a time if/when a continuous application process is adopted.	BRG	
4	Any “lead-up” rounds should reflect the end-goal of the continuous application process as closely as possible. This will allow these rounds to be a means of refining the continuous application process.	Afilias	

5	The strategic goal for future applications should be the implementation of a continuous process on a first-come, first-served basis. However, the RySG appreciates that there may be one or two further ‘application rounds’ imposed before this goal can be realistically achieved. In this respect, the RySG recommends that a clear commitment is given to a schedule of further application rounds, with shorter timespans between each round, in line with the original target of one year (AGB section 1.1.6).	RySG	
6	See response to 1.6.1. The choice of hard rounds or a continuous application process is less relevant to Internet users than the general concerns regarding potential harm to Internet users caused by gTLD proliferation.	ALAC	
1.6.3 - Do you think the length of the submission period will impact Applicant Support and what factors do you think should be considered in determining an			
1	Yes four months is sufficient if an 8 months prior announcement is made. AS LONG AS A NEW ROUND IS GUARANTEED at the latest two years later. The proposed five categories with less burdens on COI Financing/Q45-50 for .brands and “Geos by Public Authorities” will enable applicants to submit application documents within 4 months. An educational video by ICANN would also enable other applicants to submit applications within four months. Maybe showcase good applications (anonymized) from the 2012 round?	Jannik Skou	
2	Please see GAC submission to Public Comment process for the CCT-RT Draft Report.	GAC	
3	Subject to clear AGB2 being published well in advance, and the whole process being less changeable and more predictable than round 1, there should be limited impact on Applicant Support.	Nominet	
4	The length of the submission period is unlikely to impact Applicant Support. What is more important is to raise the level of awareness and implement clear guidelines for any interested parties to follow, as far in advance of an application window opening.	BRG	
5	Forget about application rounds — have a 12 month period of accepting from any source “nominations” for new gTLD “strings”. Have a CCWG evaluate the nominated strings and make a recommendation to the ICANN Board of Directors of those “strings” selected to be opened for “bids.” Potential operators would then bid for the right to operate the new gTLD by submitting as their bid the maximum fee schedule to be charged(wholesale price per domain name) for each year of the 10 year period they would operate the new gTLD registry. Lowest qualified bidder wins. At the end of the 10 year period, the gTLD would be put up for bid again. Wash, rinse, repeat. No more of this nonsense about private casino-like auctions like in the 2012 round — that just drives up costs which the operators have to recover by charging higher wholesale fees which registrants then have to bear. That auction system used in the 2012 round was corrupt and contrary to the advice given by the US DOJ Antitrust Division in 2008 cited above!	John Poole	
6	Applicant Support programs should be addressed separately and prior to any “rounds.”	Afilias	
7	We do not believe the submission period will impact Applicant Support as long a sufficient time is given prior to the application period for education and awareness (noted by the WG as significant issues to uptake).	RySG	
8	See response to 1.2.1. The choice of hard rounds of continuous applications should not affect the Applicant Support program provided that the program (and specifically its evaluation criteria) is appropriately updated.	ALAC	