

IRT Recommendations on RPMs in the New gTLDs: A Summary

How the IRT hopes ICANN will protect trademark rights in
an expanded domain name system

July 2009

Agenda

- New gTLDs Background
- Why ICANN Created the IRT
- IRT Modus Operandi
- IRT Recommendations
- Next Steps

New gTLDs Background

Implementation Recommendation Team

Introduction

“The Board has clearly heard and believes strongly that the concerns of trademark holders must be addressed before this process is opened for applications. The establishment of this team is an attempt to get proposed solutions from the people with skill in trademark protection and other issues.”

– Peter Dengate-Thrush, ICANN Chair, March 2009



What's Your Address?



To reach someone on the Internet you need to type an address into your computer – a name or a number.

ICANN is the broad based international organization that coordinates addresses for the Internet. We ensure that every address is unique and that all users can find all valid addresses.

For example, www.icann.org is one such address. It's called a domain name. The last part of a domain name (the org part) is called the top level.

There are presently only 21 'generic' top level names. That's in addition to country code names (like uk for example). There are 1.5 billion users - and they're growing fast. The Internet must continue to be as diverse as its users.

In the second half of 2009, ICANN is planning to open up a process that could create more names at that top level. So a company, a community, even a city or town, may be able to apply to have their name put at the top level of the Internet.

It's a big change.

Opening up these addresses so new names can appear could produce a new wave of innovation - innovation for business and billions of non-English speakers.

But we need **your** views on the draft application process.

Businesses, governments and users - if you haven't thought about it we need you to now. We need you to understand how you will be affected as well as the new opportunities that will occur. Importantly, we need to understand your concerns.

There has already been multiple public comment periods and there will be another soon. And we'll be holding brand conferences early in 2009 to discuss the issues.

So if you have a view, or if you're just curious, type www.icann.org into your computer and think about your address.

New Generic Top Level Domains – Openness, Change, Innovation

Where We Are Now

- ICANN's Mission: "To enhance competition and promote choice and innovation"
- Paul Twomey, ICANN CEO, June 2006: "The DNS is constrained by 21 gTLDs"
- New gTLD process begins with support of ICANN Board over two years ago
- Paul Twomey, 7 May, 2009: "It is anticipated that applications for new top-level domains will be accepted starting in the 1st quarter of 2010"

Where Are We Going

- 2009: 248 ccTLDs, 21 gTLDs
- From 2010: 248 ccTLDs, unlimited gTLDs
- New registries for cities, countries, regions, affinity groups, Domainers, entrepreneurs, industry associations, brands
- .berlin, .scot, .lat, .eco, .gay, .radio, .sport, “.brand”
- ASCII registries and IDN registries
- Permissive application system: anyone with \$185,000 can apply for “Open registry” or “Community-based registry”
- Applicants evaluated on financial, technical & operational grounds and for String Confusion
- Rolling application process with no upper limit

.berlin



DIE TOP-LEVEL-DOMAIN FÜR BERLINER

MENU

HOME

ABOUT .BERLIN

SUPPORT .BERLIN!

PRESS

CURRENT ACTIVITIES

COMPANY

CONTACT

NEWSLETTER

I SUPPORT .BERLIN

Given Name: *

Surname: *

City: *

Job/Company:



Captcha (Please enter the characters in the image): *

Submit

(* Mandatory)

We support .berlin:

Martina Lehnigk, Berlin
Nail&More Carla Herrmann,
Guben
Lita Dziemkowska, Berlin

.berlin – The Berliners' identity in the Internet

Space has become very scarce in some Internet address ranges. There are now almost 12 million domains under the top-level domain .de and more than 80 million domains under .com and .net which doesn't leave much space for sensible names. At the same time a large part of the traffic on the World Wide Web is local. This is why we want to introduce .berlin as a new top-level domain, extending the Internet namespace by a clear, local focus point. With the new namespace .berlin we'll create a regional identity for the Berlin community.

The initiative for the top-level domain .berlin is supported by a multitude of companies, organisations, associations and individuals and has won global recognition as a trailblazer for top-level domains for urban communities. The .berlin top-level domain will make people from all over the world more familiar with the places called Berlin, their people, culture, economy, power to innovate and internationalism. The Berlin community consists of Berliners in the German capital city, but also of Berliners spread around the world and of people who identify with Berlin or live in places called Berlin.

.berlin belongs to the Berlin Community - become also a part of .berlin like: 10 ICANN accredited registrars like STRATO AG or Key-Systems GmbH, BFB Branchen-Fernsprechbuch GmbH (Yellow Pages), BTM Berlin Tourismus Marketing GmbH, BTM-Partnerhotel e.V., Berlin Guild Association, City Association, Association of Berlin Tradesmen, Berlin Plaza Hotel, and many more

.paris, .nyc and other Geo-Top-Level-Domains

Some other cities started to follow the trend towards an own TLD already. We support and collaborate with the Paris and New York initiative to add value to the city TLDs for the benefit of the user.

SPONSORS



AWARDS



.SCO

campaign.scot



dotSCO

The Campaign for an Internet domain for the worldwide family of Scots

[Home](#) [Campaign News](#) [dotSCO in the News](#) [Contact Us](#) [Visit our Facebook page](#)

Main Menu

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- » FAQs

Scottish Parliament backs dotSCO campaign

Tuesday, 10 February 2009

The Scottish Parliament's Public Petitions Committee today formally endorsed the dotSCO campaign, after receiving assurances from the Government that it was doing all it could to help ensure an application could be submitted to ICANN later this year.

The unanimous vote cast by the Committee means that our campaign now has cross-party support - a crucial step in demonstrating to ICANN a widespread desire across Scotland and its diaspora for a Scottish domain.

The dotSCO team are delighted that both Parliament and Government have been so supportive of our campaign. Less than nine months after we started collecting signatures to submit the petition, we are now well on the way to submitting an application to ICANN - no small feat.

First Minister announces support for Scots internet domain

Sunday, 14 December 2008

dotSCO is delighted that the First Minister of Scotland, Alex Salmond MSP, has announced that the Scottish Government will be supporting a bid for new top-level internet domain (TLD) for the Scots community of interest online.

The Scottish Government setup a working group to consider a community top-level for the worldwide family of Scots in response to a petition from dotSCO earlier this year. As our previous newsletter highlighted our Policy Director, Davie Hutchison, has been an active member of that working group.

The First Minister has released research from the working group which shows that there is strong support for a new community TLD. 58% of organisations (from the public, private and third sectors) in Scotland support the creation of a Scots community TLD with only 18% being against. A huge 82% of organisations in the Scots Diaspora back the application with just 8% being against.

Support our campaign!

Sunday, 05 October 2008

We believe that the Scots Community of Interest online, Scottish Culture and Scotland's Languages should have the opportunity to be identified and enhanced by having its own sponsored community top-level domain (scTLD) on the Internet.

Under a dotSCO sponsored TLD those organisations, companies and individuals, throughout the world, that express themselves through Scotland's languages online, or wish to support or identify with the Scottish Culture or the Scots online community around the world will be able to register a clearly identifiable domain name.

We have gathered support from across the globe from individual Scots, Scots societies and from speakers of Scots and Gaelic for the dotSCO campaign. We believe that should we be successful that we can raise the profile of



Dot Eco LLC is an organization dedicated to promoting the acceptance and implementation of the .eco top level domain, and is backed by leading ecological and philanthropic groups, environmentally conscious high-profile individuals, and leading scientific voices.



our partner



Dot Eco has partnered with Al Gore and the [Alliance for Climate Protection](#) to bring the ".eco" top level domain to life. The Alliance's mission is to persuade the American people—and people elsewhere in the world—of the importance and urgency of adopting and implementing effective and comprehensive solutions for the climate crisis. Over 2 Million people have joined the Alliance's "We can solve it" effort.

Find out how you can support .eco

Latest news

May 4 Dot Eco LLC Supports Roz Savage

Apr 8 Sierra Club Supports Creation of New .eco Web Address

Apr 4 Dot Eco LLC Announces German Expansion

Nonprofit organizations



Alliance for Climate

Corporations



Energy Revolutions

Individuals



Roger Moore

.gay

The screenshot shows the dotGay website homepage. At the top left is the dotGay logo with the tagline "The new Top Level Domain for the Gay Community". To the right are social media icons for Facebook (Profile | Group) and Twitter (TWITTER DO YOU FOLLOW ME? Twitter). A left sidebar contains navigation links: User Login, What is dotGAY?, Who is behind .gay?, Why a dotGAY?, Example Domains, Showcase, Allocation Policy, Timeline, I support dotGAY, Other new qTLD's, Memberships, Links, and Press. The main content area features a ".gay TLD" heading, a description of the TLD, a rainbow ".gay TLD for us!" logo, and a list of example domains.

dotGay
The new Top Level Domain for the Gay Community

Profile | Group

TWITTER
DO YOU FOLLOW ME?
Twitter

[User Login](#)

[What is dotGAY?](#)

[Who is behind .gay?](#)

[Why a dotGAY?](#)

[Example Domains](#)

[Showcase](#)

[Allocation Policy](#)

[Timeline](#)

[I support dotGAY](#)

[Other new qTLD's](#)

[Memberships](#)

[Links](#)

[Press](#)

.gay TLD

The new Top Level Domain for the Gay Community

dotGAY in a nutshell: [Click here.](#)

[Link back to us!](#)

dotGAY is a nonprofit organization aimed to create the ".gay" TLD (domainsuffix). dotGAY will be a managed TLD. See an example of a keyword .gay domain [here](#).

Unregistered .gay domains will resolve to a special auto generated webpage in order to help us identifying community relevant terms, see [here](#).

We offer a community-wide central [login](#) in order to identify yourself with the same login across all .gay portals and services.

olympics.gay | lawyers.gay | boston.gay | travel.gay | music.gay | art.gay | civilrights.gay
weddings.gay | palmsprings.gay | mikes-steakhouse.gay | shopping.gay | cinema.gay
stonewall.gay | personals.gay | your-business.gay | california.gay | usa.gay | berlin.gay

.radio



Home / Twitter / Facebook / Radio Player / News & Press / Investor Relations / About / Contact

.Radio TLD

Partners

Showcase

Factsheet

FAQs

Policies

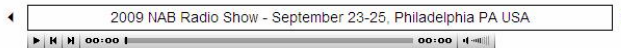
Member & Assn.



Featured Client.



Congratulations to Student broadcasters at Bloomfield Hills Schools' 88.1 FM who won 8 of 23 awards from the



*The Player Requires Microsoft Silverlight v2 & Adobe Flash v10.

dotRadio™ - Top Level Domain

.Radio is the New Generic Top Level Domain for the On Air - Online Community.

The .radio gTLD will provide an unparalleled branding opportunity worldwide for the Radio, Broadcasting, Streaming, Multimedia, Music and Social Network communities. **dotRadio™ is a Sound Web Address!**



On Air Radio reaches more than 234 million people ages 12 and older each week, encompassing 95% of college graduates aged 25 to 54 who make more than \$50,000 a year, per the preliminary findings of Arbitron's RADAR 100 National Radio Listening Report.
- According to Arbitron RADAR 100 - March 15, 2009

Online Radio reaches 42 million Americans age 12 or older listen to a radio over the Internet during an average week - up from 33 million listeners one year ago.
- According to Edison Media Research - April 16, 2009

BRS Media has pioneered the 'Multimedia' domain space since launching dotFM® and dotAM®, the .FM & .AM Top Level Domains in 1998. For over 11 years, BRS Media has engaged radio properties, web sites and online media organizations worldwide to move up to a 'Great Sounding Web Address' under .FM & .AM

Some of our clients include: CBS Radio, Emmis Comm., Bloomfield Hills School District, Entercom Comm., Clear Channel, The University of Akron, Cumulus Media, Midwest Comm., Sony BMG Music Entertainment (Australia) Limited, Digitally Imported, JSC Media Plus Moscow, Olivet Nazarene University, Radio Partners Inc Philippines and More!

A few of our clients' Websites include: Las Vegas' Mix 94.1 (mix941.fm), Tri-Cities Newstalk 870 (newstalk870.am), Internet Radio Network SKY.FM (sky.fm), LA's Talk Station KGIL 1260 (1260.am), Malaysia's #1 Hit Station Hitz.fm (hitz.fm), Social Media Service PING.FM



Implementation Recommendation Team

.sport



How you could use a .sport domain

How you could use a .sport domain

Think global

With more than 1.4 billion people throughout the world, using the word "sport" to mean just that, your brand will be globally visible and strongly identified with the sports community.

If you are in a media, how about "google.sport", or "cnn.sport" to deliver sports-specific content ?

If you are a car manufacturer wishing to make your sporting activities more visible, how about "mycar.sport", rather than some lengthy URL on your company's main web site ?

The possibilities are endless for companies for which sports represent a sizable part of their activities or advertisement budget. Registering with .sport lends credibility to these activities, protects your domain name registered with other top level domains and gives your customers and search engines another entry point to your web site.

Act local

Obviously, what applies globally can also make sense at the local level. A national or regional newspaper could a web site Te dedicated to sports news like "mypaper.sport". National sports federations can also benefit from a visible ".sport" domain.

DotSport is committed to the protection of your brand name. This is why we will have a so-called Sunrise period before the official launch, during which trademark owners will be able to register their brand safely.

Categories

Events

Press Releases

Press Clippings

Search

 OK

Twitter Updates

Let us all welcome DotGAY, The new Top Level Domain for the Gay Community <http://s.isoc.lu/zpq47x> 5 days ago

RT @circleid: Commerce Department: Headed Toward ICANN 3.0? <http://tinyurl.com/djrpbk> 24 days ago

#ICANN Pool.com Starts Accepting Pre-orders For Domain Extensions That Don't Exist yet, including .SPORT ! <http://is.gd/tld3> 27 days ago

The Experience of Rights Owners

- “Domain abuse is a business with low overheads, no barriers to entry & few risks” (IRT Report)
- WIPO reports 8% increase in UDRP cases in 2008: 27,000 domain names disputed since 1999
- All five brand owners on IRT face at least one new domain name infringement every day of the year

The Experience of Rights Owners

- Registrar failure, termination and compliance problems
- Some ccTLD registries systemically abused
- Serial infringers falsify WHOIS details, hide behind Proxy Registration services, prosper from PPC
- Consumers confused and cheated
- Cybersquatters playing the system

New gTLD Issues for TM Owners

At the Top Level

- “Permanent string preclusion”
- Uncertainty over the Objection process

At the Second Level

- Policing abusive registrations
- The cost of defensive registrations
- New opportunities for malicious behaviors (e.g., phishing)
- Monitoring registrations in IDN registries

Plus, for some, if, when & how to apply

New gTLD Rollout

- ICANN developing the process through consultation: no turning back
- October 2008 - 1st Draft Applicant Guidebook (DAG)
- February 2009 - 2nd DAG
- Over 300 comments with business & trademark communities highly critical
- “Four overarching issues have been raised in the comment process that require further work: Trademark Protection, Security & Stability, Malicious Conduct and Demand/Economic Analysis. It is very important to take the time to resolve these overarching issues”

– ICANN CEO Paul Twomey, March 2009

Why ICANN Created the IRT

Implementation Recommendation Team

The IRT

ICANN Board requests Intellectual Property Constituency to form Implementation Recommendation Team (IRT) March 2009.

“Comprised of an internationally diverse group of persons with knowledge, expertise and experience in the fields of trademark, consumer protection, or competition law, and the interplay of trademarks and the domain name system to *develop and propose solutions to the overarching issue of trademark protection in connection with the introduction of new gTLDs.*”

The IRT Team

1. Caroline Chicoine, Fredrikson & Byron, US (Chair)
 2. Mette Andersen, Lego, DK
 3. Jonathan Cohen, Shapiro Cohen, CA
 4. J. Scott Evans, Yahoo! Inc., US
 5. Zahid Jamil, Jamil & Jamil, PK
 6. Stacey King, Richemont, UK
 7. Hector Manoff, Vitale, Manoff & Feilbogen, AR
 8. Russell Pangborn, Microsoft Corp., US
 9. Mark Partridge, Pattishall, McAuliffe, Newbury, Hilliard & Geraldson LLP, US
 10. Kristina Rosette, Covington & Burling LLP, US
 11. Ellen Shankman, Ellen B. Shankman & Associates, IL
 12. David Taylor, Lovells LLP, FR
 13. Kiyoshi Tsuru, Morales & Tsuru Abogados, S.C., MX*
 14. Fabricio Vayra, Time Warner Inc., US
 15. Mary Wong, Franklin Pierce Law Center, SG
 16. Nick Wood, Com Laude, UK
 17. Jeff Neuman, Neustar, Inc., US (Registry representative)
 18. Jon Nevett, Network Solutions LLC, US (Registrar Representative)
- Plus 6 Ex Officio:
- 4 from IPC including President Steve Metalitz & INTA's Claudio DiGangi
 - all supported by ICANN staff

* withdrew for personal reasons

IRT Timeline

- March 12-23 IPC leadership solicits Chairs of ACs and Constituency leadership for names of possible IRT members and Chair; IRT members and Chair selected
- April 1-2 1st face-to-face meeting in Washington, DC
- April 24 1st draft report published for public comment
- May 11 IRT consultations with entities having diverse interests in DNS and RMPs in San Francisco, CA
- May 12-13 2nd face-to-face meeting in San Francisco, CA
- May 29 Final draft report published for public comment & sent to Board
- June 21 Presentation of final draft report to ICANN Board at Sydney Open Meeting
- July 13 ICANN consultation in New York, NY
- July 15 ICANN consultation in London
- Late July ICANN consultations in Hong Kong & Abu-Dhabi two weeks later
- Aug/Sept (?) Publication of 3rd DAG including Board's decision on IRT recommendations

Diversity of Experience & Views

“The views of the IRT reflect the views of business and trademark interests in general. A sizeable number of our team would have preferred status quo with no new gTLDs until better Rights Protection Mechanisms are in place for the existing gTLDs. Others favored the measured introduction of Sponsored or Community-based gTLDs. Some support the current expansion, seeing the advantages for commerce and the consumer alike in open competition and innovation.”

– from Open Letter attached to IRT Final Report

San Francisco Consultations

15 organizations/individuals who submitted comments on 1st Draft Report of IRT invited to address the IRT including representatives of:

- WIPO
- Trademark Owners (AT&T, Verizon)
- Organizations that proposed new RPM (Deloitte, Demand Media/ENOM, The Progress & Freedom Foundation)
- U.S. Chamber of Commerce
- Non-Trademark Internet Users (Internet Commerce Association)
- Organizations operating RPM (Nominet UK, eBay-VeRO)
- Brand Protection Registrars (CSC, MarkMonitor, Melbourne IT, Net Names)

IRT Modus Operandi

Implementation Recommendation Team

IRT Modus Operandi

- Weekly two (2) hour teleconference calls from 25 March, 2009 - 29 May, 2009
- Thousands of e-mail communications
- Two (2) two-day face-to-face meetings
- Numerous additional conference calls to further discuss and finalize specific proposals
- One (1) full-day consultation with entities having various interests in the DNS and RPMs

IRT Modus Operandi

- Reviewed and considered comments on 1st & 2nd DAG (over 600 pages of material)
- Grouped by type & prioritized
- Developed proposals based on priorities
- Tested the efficacy of each proposal against checklist
- Reviewed and considered all comments on 1st draft IRT report dated 24 April, 2009
- Conducted consultations with entities having diverse interests in DNS and RPMs
- Revised and finalized draft report based on comments received and further deliberations among the IRT

IRT Checklist

- What are the harms that are being addressed by the solution?
- Will the solution scale?
- Does it accommodate territorial variations in trademark rights?
- Does it conform to extent of actual legal rights?
- Does solution work in light of IDNs?
- To what extent can solution be gamed and abused?
- Is it the least burdensome solution?
- Is it technologically feasible?
- How will solution affect consumers and competition?
- What are the costs and who pays for them?

IRT Recommendations

Implementation Recommendation Team

Final Report

Proposals grouped in five areas

1. IP Clearinghouse, Globally Protected Marks List, IP Claims
2. Uniform Rapid Suspension System (URS)
3. Post-Delegation Dispute Resolution Mechanism at Top Level
4. Thick WHOIS
5. Expansion of test for string comparison during initial evaluation

IP Clearinghouse

To assist registries in operating cost effective RPMs and reduce burden on TM owners

- Centralized database of registered trademark rights
- Pay once a year for TM right to be validated and maintained by operator appointed by ICANN via ITT
- Used to support applications in RPMs whatever the rules of the registry, whether it is ASCII or IDN
- No need for rights owner to pay pre-launch application fees over & over to registries: reasonable fees
- **Essential platform for a tapestry of globally effective RPMs**

IP Claims & SER

The IP Clearinghouse can support:

- A ***Pre-Launch IP Claims Service*** that will notify new gTLD applicants and trademark owners that a current validated right exists on a term being applied at the second level
- SERS – Standardized ***Sunrise Eligibility Requirements*** – minimum protections to be employed by all registries that decide against using the IP Clearinghouse

Globally Protected Marks List

- List of “supernova” marks maintained in IP Clearinghouse
- Standard for inclusion very high: ownership of xxx TM registrations issued before 1 November, 2008 of national effect issued in at least xxx countries. ICANN researching
- At Top Level: identical or confusingly similar new TLD applications initially blocked; request for reconsideration available and applicant can overcome initial block if demonstrates legitimate right to use applied-for TLD
- At Second Level: Blocked unless an applicant can demonstrate that registration is consistent with TM laws and will not infringe legal rights of GPM owner

Uniform Rapid Suspension (URS)

- Objective: fast, effective, fair & low cost to all.
- “The URS is not meant to address questionable cases of alleged infringement (e.g., use of terms in their generic sense) or for anti-competitive purposes or denial of free speech, but rather for those cases in which there is no genuine contestable issue as to the infringement and abuse that is taking place.... It is a low-cost and rapid means for taking down infringing domain name registrations, yet preserving a registrant’s right to a hearing and/or appeal.” (IRT Report)

Uniform Rapid Suspension (URS)

Addresses current problems associated with straightforward abuses:

- Serial infringement of multiple domain names
- Transfer delays and rogue registrars
- Ability of abuser to monetize domains during a case
- Gaming of the UDRP process
- Length and cost of UDRP

Types of domain names these recommendations apply to:

- Domain names registered under the new gTLDs (not under current gTLDs)
- Domain names that incorporate a trademark or typosquatted variation within the domain name and are used in an abusive manner (not legitimate commentary sites, etc.)
- Follows the UDRP definitions of bad faith use and registration to determine abuse

How URS Will Work

- Neutral URS Provider(s) appointed by ICANN
- Pre-registration of rights via IP Clearinghouse
- Upon initiation of process, no transfers of the domain name permitted (note - website is NOT taken down at this stage)
- Upon decision by Examiner on behalf of complainant, domain name frozen at the registry and redirected to a standard URS process page
- Misuse by Complainant = One year ban
- Lower fee than UDRP: \$200 suggested
- Faster than UDRP: 14 days for slam-dunk cases
- Right of appeal with domain unlocked

Post-Delegation Mechanism

- Based on WIPO proposal to limit the possibility of systemic abuses by “bad actor” Registry Operators
- To tackle breach of RPM, bad faith intent to profit from registration of infringing domain names
- Mechanism suggested:
 - 3rd party submits a claim to ICANN
 - Refundable deposit
 - Investigation by ICANN
 - If material breach, various enforcement mechanisms include monetary sanctions, suspension or termination of contract
 - If no material breach and unresolved after negotiation period, then initiate Post Delegation Dispute
 - Sanctions for abuse of mechanism

Thick WHOIS

Thick WHOIS

- Central, registry level provision of WHOIS for all domain names within that registry (like .biz, .info)
- Necessary to protect consumers and IP owners
- Already included in recent ICANN revisions to DAG

Universal WHOIS

- Recommended that ICANN explore a Universal WHOIS maintained by ICANN covering all gTLDs

Algorithm

- ICANN has commissioned an Algorithm from SWORD Inc. which checks Top Level applications against:
 - Existing TLDs
 - Other strings applied for
 - Names on ICANN's reserved list
 - Geographical terms
 - Terms that threaten stability of the internet
- Reliance on visual similarity alone insufficient
- Need to expand to ensure further analysis of those identified by the algorithm to consider aural and commercial impression (meaning)

Other IRT Concerns

- Development of universal standards & practices for proxy domain name services
- Applicants (including .brand registries) to be allowed to apply for more than one character string in an application – e.g., ASCII & Kanji, Arabic or Cyrillic
- A requirement for all applicants to describe in detail the RPM they will be offering at point of application

Next Steps

Implementation Recommendation Team

Next Steps

Read IRT Final Report at:

<http://www.icann.org/en/topics/new-gtlds/irt-final-report-trademark-protection-29may09-en.pdf>

Comment period open on final report until 29, June 2009:

irt-final-report@icann.org

Read the comments of others on the report:

forum.icann.org/lists/irt-final-report

Speak Up

Support the IRT Report at the highest level you can

1. Submit comments
2. Attend consultations if possible:

July 13 New York

July 15 London

End of July Hong Kong

Early August Abu-Dhabi

The End

Implementation Recommendation Team