

ICANN BOARD PAPER NO. 2013-06-04-2b

TITLE: **Summary and Analysis of Applicant Responses to GAC Advice**

PROPOSED ACTION: **For Committee Information and Discussion**

EXECUTIVE SUMMARY:

ICANN staff is presenting to the New gTLD Program Committee (NGPC) a summary and analysis of GAC Advice presented in the GAC Beijing Communiqué published on 11 April 2013. Attachment A to the Reference Materials, organizes that information according to the GAC Advice Framework as defined by the ICANN Board New gTLD Program Committee (NGPC) on 22 May 2013. Broadly, applicants expressed their appreciation for the opportunity to provide a response to the GAC Communiqué and thanked the GAC for providing a comprehensive set of advice to the ICANN Board on the subject of safeguards. Most applicants responded with how they intended to comply with certain safeguards; however, many applicants also commented on the nature of the Advice, expressing either support or concern.

The Beijing Communiqué also included specific advice on rejection or objection to four specific applications (.africa, .gcc, .islam, and .halal) to which the respective applicants have responded. Included in these materials (Attachments B – E to the Reference Materials) are individual summaries of the responses from each these four applicants, prepared by ICANN.

Signature Block:

Submitted by: Christine Willett

Position: Vice President, gTLD Operations

Date Noted: 31May2013

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REFERENCE MATERIALS

Summary and Analysis of Applicant Responses to GAC Advice

The following attachments are detailed analyses of Applicant responses to GAC Advice

- Exhibit A – Summary and Analysis of All Applicant Responses to GAC Advice¹
- Exhibit B - Summary of GAC Advice Response from applicant for dot AFRICA²
- Exhibit C - Summary of GAC Advice Response from applicant for dot GCC³
- Exhibit D - Summary of GAC Advice Response from applicant for dot ISLAM⁴
- Exhibit E - Summary of GAC Advice Response from applicant for dot HALAL⁵

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¹ The full list of applicant responses, by application, can be accessed at <http://newgtlds.icann.org/en/applicants/gac-advice>

² The full text of the applicant's response for .AFRICA can be accessed at: <http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-1165-42560-en.pdf>.

³ The full text of the applicant's response can be accessed at: <http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-1936-21010-en.pdf>.

⁴ The full text of the applicant's response for .ISLAM can be accessed at: <http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-2130-23450-en.pdf>.

⁵ The full text of the applicant's response for .HALAL can be accessed at: <http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-2131-60793-en.pdf>.



Summary and Analysis of Applicant Responses to GAC Advice

31 May 2013



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Executive Summary

Introduction

This report is intended to provide a summary and analysis of Applicant Responses¹ to GAC Advice presented in the GAC Beijing Communiqué published on 11 April 2013. ICANN Staff collected and reviewed applicant responses to GAC Advice according to the GAC Advice Framework as defined by the ICANN Board New gTLD Program Committee (NGPC) on 22 May 2013.

The Communiqué covers the following five topics: 1) New gTLDs, 2) Registrar Accreditation Agreement (RAA), 3) WHOIS, 4) International Olympic Committee and Red Cross/Red Crescent, and 5) Public Interest Commitments Specifications.

The emphasis of the Communiqué is on the New gTLDs, which have been subdivided into the following areas: a) GAC Objections to Specific Applications, b) Safeguard Advice for New gTLDs, c) Strings for Further GAC Consideration, d) GAC Requests, e) Community Support for Applications, f) Singular and plural version of the same string as a TLD, and g) Protections for Intergovernmental Organisations.

Summary of Responses to GAC Advice

Broadly, applicants expressed their appreciation for the opportunity to provide a response to the GAC Communiqué and thanked the GAC for providing a comprehensive set of advice to the ICANN Board on the subject of safeguards. Most applicants responded with how they intended to comply with certain safeguards; however, many applicants also commented on the nature of the Advice, expressing either support or concern.

Applicants appear to generally support the spirit of the GAC Advice and specifically the six safeguards for all applicants with many expressing how they will (or already do via their respective applications) comply with the six safeguards. Many expressed support for the position of the GAC that any safeguards should 1) be respectful of human rights, 2) respect substantive procedural laws, and 3) be operated in an open/transparent manner – none expressed opposition or concern over this element. At the same time, they expressed concerns that the Advice was too broad in its reach and did not take into account applicant's individual applications and respective responses.

There was also significant concern that the Advice seems to circumvent the bottom-up, multi-stakeholder model in its reach, with a few suggesting that GAC Advice on safeguards should be addressed by the Board only after community discussion. At the same time, some expressed concern that processing and responding to the GAC Advice would serve to further delay the New gTLD Program.

¹ The full list of applicant responses, by application, can be accessed at <http://newgtlds.icann.org/en/applicants/gac-advice>

Analysis of Responses by Framework Category

The following are summaries and analyses of applicant responses to each element of the GAC Advice based upon the GAC Advice Framework being used by the NGPC. These responses represent over 700 applications including portfolio applicants. Portfolio applicants providing responses across their entire portfolios of applications include Donuts (307), Amazon (35), Famous Four Media (23), Afilias Limited (31), and Charleston Road Registry (31), where the numbers in parenthesis represent the number of applications named under each applicant's response.

Objections

The GAC named two strings (*.africa* and *.gcc*) as receiving consensus objection advice. Only two applicants (the ones directly affected by the advice) expressed an opinion on the objection advice addressing these strings. In their respective responses, applicants DotConnectAfrica Trust and GCCIX WLL each defend their application in the face of the advice.

Staff recommends the Board review these responses in their entirety given these are the only two strings receiving consensus objection advice and are explicitly named outside of categories or groups of strings.

Concerns

The GAC named two strings (*.islam* and *.halal*) as receiving "concerns" advice over religious sensitivities. Only the applicant for these strings, Asia Green IT System (AGIT), expressed an opinion on the concerns advice for their applied-for strings, defending their respective application in the face of the advice.

Staff recommends the Board read these responses in their entirety given these are the only two strings receiving concerns advice and are explicitly named outside of categories or groups of strings.

Further GAC Discussions

The GAC named twelve strings where further GAC consideration may be warranted and advised the Board that these strings not proceed beyond Initial Evaluation.

Over 25 unique applicants, representing nearly 400 application responses, addressed this topic. All were against pausing the application process – none were in support. Several of the respondents were "portfolio" applicants. Of these, applicants expressed concern over being named in the advice but without having

previously received an Early Warning. Applicants also expressed concern that pausing applications after Initial Evaluation is expressly contrary to section 3.1 of the AGB.

General support of pausing strings for further GAC consideration

Staff did not identify any citations supporting the pausing of the application processes after completion of Initial Evaluation.

General concern or opposition of pausing strings for further GAC consideration

Selected citations

Famous Four Media

- “We did not receive any Early Warnings related to the application for .wine (1-1223-37711) so we were quite surprised and taken back that the GAC has asked for ours and other applications for .wine being held back. Since the publication of the GAC advice on April 11, we have not received any formal correspondence from ICANN or the GAC as to why the GAC has asked for a hold on this application. This raises a very important concern that we hope the ICANN Board shares.”
- “The GAC issued Early Warning in November. During those 5 months of deliberations, not one country stepped forward and raised an issue with our application for .wine.”
- “...contrary to the express wording of the Applicant Guidebook at paragraph 3.1 which provides “The receipt of GAC advice will not toll the processing of any application (i.e., an application will not be suspended but will continue through the stages of the application process).””

Amazon EU

- “Applicants Relied on Rules Set by ICANN. The GAC’s attempt to hold an application because of a government’s potential conflict destroys the premise of consensus entirely, which in turn significantly dilutes surety and stability in the new gTLD process. Additionally, it allows a government to supersede the trademark and free-expression rights granted by other governments and obtain global rights over applicants that the government would not otherwise possess.”
- “Applicants relied on the AGB Provisions on Geographic Names. The Communiqué now backs away from more than four years of multi-stakeholder work on the geographic name issue by its new attempt to isolate strings that raise geographical issues. This action is disruptive (not only for us and our applications) because the effect is not dissimilar to that of consensus Communiqué advice but without the essential component of consensus.”

Donuts

- “Having received Early Warnings on .VIN and .WINE applications, Donuts held productive discussions with governmental representatives from France and Luxembourg regarding appropriate safeguards, and at the invitation of these governments, will continue discussions related to any potential accommodations.”
- “Donuts received no Early Warning for .SPA, and the GAC provided no rationale for the GAC seeking to delay this application. The AGB must have contemplated that the GAC would provide rationale on which to base a reply. If the GAC’s concern is that Donuts’ intention is to employ the gTLD as a city name (as detailed in the AGB), we refer the Board to Donuts’ application for .SPA—our intention clearly is not to do so.”
- “The GAC seeks to delay consideration of these applications without providing justification, making an informed response impossible.”

Patagonia, Inc.

- "Patagonia went to great lengths before deciding to proceed with its .patagonia application to ensure that the .patagonia gTLD string is not a "Geographic Name" as ICANN has defined that term. Preventing Patagonia's .patagonia application from proceeding now beyond Initial Evaluation contradicts and renders moot key principles of certainty and clarity for applicants and a predictable evaluation process that were adopted by the GNSO, the Board, and the GAC."

Singular versus Plural

The GAC believes that singular and plural versions of the string as a TLD could lead to potential consumer confusion.

A handful of unique applicants, representing nearly 400 application responses, addressed this topic. Most were against changing the existing policy but with one identified in support of the GAC's concern. The supporting applicant has filed a string confusion objection. Those not supporting the GAC's concern indicated this topic was agreed as part of the AGB and is addressed in the evaluation processes.

General support of revisiting singular versus plural strings

Selected citations

SportAccord

- "SportAccord joins the GAC's expression of concern about a TLD representing the plural form of a word while another TLD represents the singular form of the same word.
- SportAccord filed a string confusion objection because an extremely high likelihood of confusion exists between ".sports" and ".sport". SportAccord was able to take action to prevent confusion between .sport/sports only because it is the applicant for the .sport TLD. The other applicants for .sport/sports did not file a string confusion objection.
- This points to a serious flaw in the ICANN gTLD program. Even though string confusion is highly detrimental to members of the affected communities, a TLD registry lacking community accountability may find it profitable. The ICANN gTLD program should not rely on the self-interest of TLD operators alone to avoid TLD string confusion."

General concern or opposition to revisiting singular versus plural strings

Selected citations

T V Sundram Iyengar & Sons Limited

- TVS is concerned that an attempt by the GAC to impose a one size fits all litmus test without a proper legal analysis based on established international law could lead to unintended consequences.

Famous Four Media

- We agree with ICANN CEO Fadi Chehadé and the ICANN Board's collective responses to these questions in Beijing, that the independent panels have ruled and it would not be appropriate for either ICANN or the Board to overturn these decisions.

Donuts

- "The GAC asks the Board to "Reconsider its decision to allow singular and plural versions of the same strings." However, this was not a Board decision. The Board approved the

evaluation process, which included independent assessment of each application against AGB criteria, appropriately away from the interests of those with stakes in the outcome. “

- “The findings of the independent string similarity review panel should not be upset, absent a finding of mis- and malfeasance. The GAC cannot replace the evaluators’ opinions with that of its own.”
- “ICANN should not open the door to one stakeholder group undoing independently arrived-at results because that stakeholder group doesn’t care for the outcome.”

Protections

The GAC stressed the important role of IGOs and that their names and acronyms warrant special protections in an expanded DNS.

A handful of unique applicants, representing nearly 350 application responses, addressed this topic. Twice as many expressed support (versus concern) of some form of protections for IGOs, though noting implementation concerns. Regarding protections afforded the IOC and RCRC, no applicant expressed concern or opposition and two applicants expressed some level of support or willingness to comply.

General support of IGO protections

Selected citations

Famous Four Media

- “We consider the Protection of Intergovernmental Organization (“IGO”) names to be very important. As part of our applications, we committed to implementing a program to protect IGO’s, well before any ICANN Board or GNSO action on this issue.”
- “As the GNSO is currently devising a policy related to this issue, the applicant will implement any GNSO recommendations made in this very important area. Absent the timely conclusion of the GNSO work, each Applicant will use strings registered as second level domains in the .int gTLD as the basis for this protection.”

Donuts

- “Donuts recommends the Board take the following actions: 1. Implement GAC advice pertaining to: d. protecting full names of IGOs at the top and second levels. (Donuts does not agree with full second-level reservation of IGO acronyms, but agrees with the Registry Stakeholder Group’s proposal to add acronyms to the Trademark Clearinghouse, making them eligible for Sunrise and claims protections.)”
- “More than one party can legitimately use many acronyms, including those documented by the GAC in its recommendations regarding IGO protections. Donuts supports enabling IGOs, at their option, to register their acronym names into the TMCH and utilize the mandatory Sunrise and claims processes based on individual registry requirements, similar to the treatment of validated trademarks. In accordance with existing TMCH rules, priority should not be assigned to IGOs ahead of trademark holders; names instead should be allocated in sunrise to competing parties according to registration requirements of that registry. Doing so grants IGOs the same enhanced rights that trademark holders enjoy under the AGB, provides IGOs and trademark holders “first crack” at acronyms in unrestricted gTLDs, and is ultimately the most equitable and practical method for all parties.”

DotKids Foundation Limited and GTLD Limited

- “We are supportive of this advice as a preventative initial protection for the IGO names and acronyms.”
- “Furthermore, the Registry will actively participate in the development of appropriate process and policies for governments, public authorities or IGOs to challenge abuses of names with national or geographic significance.”

General concern or opposition to IGO protections

Selected citations

Top Level Design, LLC

- “We are of the opinion that blocking all IGO names as outlined by the GAC in previous advice will remove a significant number of important acronyms and terms from use that do not threaten to confuse users or impede the work of the IGO in question. We believe that the likelihood of user confusion with regards to specific TLDs should be considered in the implementation process for IGO related blocks. We look forward to the timely resolution of this issue and intend to comply in full with the outcome.”

GCCIX WLL

- “It is obvious that GAC and the ICANN Board put a great deal of thought and effort into laying down the rules for the protection of legitimate IGO names and acronyms. We have demonstrated above that the “.GCC” string is not included in the protections offered under these rules, and that it is specifically excluded by the GAC from protection as an IGO name in this round of applications.”

General support of IOC/RCRC protections

Selected citations

Donuts

- “Donuts recommends the Board take the following actions: 1. Implement GAC advice pertaining to: c. making permanent the protections for International Olympic Committee (IOC) and Red Cross/Red Crescent (RCRC) at the top level prior to delegation of new gTLDs”

GTLD Limited

- “We are prepared to implement such protections. Based on our original submission, and as explained above in “g. Protections for Intergovernmental Organisations”, this can be addressed within the proposed mechanism.”

General concern or opposition to IOC/RCRC protections

Staff did not identify any citations expressing concern or opposition to IOC/RCRC protections.

Advice across all applications

The GAC advised that six safeguards should apply to all new gTLDs and be subject to contractual oversight. Applicants representing over 500 applications commented on these six safeguards with approximately 60% of unique applicants in support of the spirit of reasonable, implementable safeguards. Most included discussion of how their applications would comply with the six general safeguards, if not expressing outright support. Approximately 25% of unique applicants expressed concern or opposition of safeguards, even though in some cases they still planned to comply.

The remainder (approximately 15%, inclusive of Donuts 307 applications) are generally neutral in their position or had elements of their response representing both support and concerns that made it difficult to determine clear support or opposition.

General support of safeguard advice across all gTLDs

Selected citations

Afilias

- “Afilias supports the efforts of ICANN and the Governmental Advisory Committee (GAC) to deploy the new TLDs in a safe, secure and responsible manner. As detailed in our applications, Afilias has already included many measures to address the issues raised by the GAC, and we intend to work closely with the ICANN and GAC members on any additional areas to further enhance internet security and stability.”
- “With respect to the advice contained in the GAC Communique, we generally support the comments of the New TLD Applicant Group (NTAG) and the Registry Constituency (RySG), which are submitted separately.”

Allfinanz Deutsche Vermögensberatung Aktiengesellschaft (*this language was included in several applicant responses*)

- “We recognize the GAC concerns particularly in regard to implementing safeguard mechanisms as described in the applications...”

United TLD Holdco Ltd.

- “Despite our full commitment to these six Safeguards and our agreement that all registry operators should make similar commitments, United TLD warns ICANN that the GAC should not dictate the specific processes, procedures or requirements for implementing these safeguards. Registry Operators should be able to develop their own methodology within ICANN policy guideline and best practices for conducting the security checks, for example, or for maintaining statistical reports and for addressing violations of their terms of service. There is no single “best practice” for implementing these safeguards and registry operators should not be forced to adopt specific methods or processes for doing so. Innovation takes place when competition is allowed to develop different methodologies to address a problem. Therefore, United TLD agrees with GAC Advice related to these 6 Safeguards so long as it is allowed to develop its own specific methodology and practices for implementation.”

General concern of safeguard advice across all gTLDs

Selected citations

Amazon EU S.Ã r.l.

- “We are concerned that, if implemented, the Communiqué will circumvent years of active and transparent Community development by reversing policies and implementing new requirements and definitions on applicants, registries and registrants”

Design Trend Registry (*this same language was included in many responses*)

- “In short, we are both disappointed and frustrated that the GAC has chosen to step beyond its agreed remit and issue the broad, generic Beijing Advice covering all new gTLD applicants.”
- “We believe the provision of the Beijing Advice covering all new gTLD applications constitutes a material change to the scope and purpose of the Advice which was to have been

provided. We see no reason why the Beijing Advice was not confined to targeting specific applications as originally (and reasonably) expected.”

- "...we have no option but to agree to the Safeguards in part as further described below. However, we would flag that such agreement and response is made under duress."

PRIMER NIVEL S.A.

- "The Safeguard Advice is a policy initiative that is not consistent with the GAC Advice as stated in module 1.1.2.7 of the Applicant Guidebook. This initiative does not respect the proper Policy Development Process, fundamental to the whole organization. Furthermore, we think that the advices could represent major changes to rules and structure of the actual new gTLD program."

NU DOT CO LLC

- "...we have committed to implementing these Safeguards, neither the ICANN board nor the GAC should attempt to dictate the specific processes or methodologies."

IG Group Holdings PLC

- "We are both disappointed and frustrated that the GAC has chosen to step beyond its agreed remit and issue the broad, generic advice covering all new gTLD applicants. Module 3 of the Applicant Guidebook, states that "the process for GAC Advice for New gTLDs is intended to address applications that are identified by governments to be problematic, e.g., that potentially violate national law or raise sensitivities." We believe the provision of the Beijing communiqué covering all new gTLD applications constitutes a material change to the scope and purpose of the advice which was to have been provided. We see no reason why the Beijing communiqué was not confined to targeting specific applications as originally (and reasonably) expected."

Neutral or crossover position regarding safeguard advice across all gTLDs

Selected citations

Donuts

- "Against the backdrop of a completely prepared gTLD expansion program, the GAC's Beijing advice is extraordinarily overbroad and is not limited (as mandated in the AGB) to specific strings."
- "The Board should accept most of the GAC's advice and work towards implementation. Some can be implemented immediately, other recommendations will require more detailed implementation planning by the community, and others need more extensive community discussion where there is a policy or important implementation shift and should apply to all gTLDs."

Category 1 Safeguards

The GAC advised the Board that strings linked to regulated or professional sectors should operate consistent with applicable laws. These strings are likely to invoke a level of implied trust from consumers and carry higher levels of risk associated with consumer harm.

The number and nature of responses varied across the eight mentioned category 1 safeguards; however, generally, responses were supportive of safeguards 1-5 with never more than approximately 8% of unique applicants expressing concern. On the other hand, for safeguards 6-8, there was more concern expressed with upwards of approximately 25% of unique applicants expressing concern. Taking neutral positions into consideration, support approached 70% of unique applicants.

Generally, applicants considered the spirit of 1-5 as implementable whereas 6-8 are largely not implementable and against the GAC's own principles.

General support of category 1 safeguards 1-5

Selected citations

DotMedico TLD Inc.

- “We understand the GAC’s apprehension around the delegation of sensitive strings that are related to consumer protection, and regulated markets. We also acknowledge the fact that this string is sensitive in nature, and we have made significant efforts to prepare our application accordingly.”

Dot Beauty LLC

- “We agree with this GAC advice in principle. The gaming industry is regulated. Applicable jurisdictional laws exist specific to casino operations and gaming. There is a level of implied trust from consumers when a government licensing environment is involved. Governments create Gaming Control Boards for the very reason of higher levels of risk associated with consumer harm.”

General concern or opposition of category 1 safeguards 1-5

Selected citations

DotHealth LLC

- “DotHealth believes the GAC Advice pertaining to Category 1 Strings is inconsistent and cannot be implemented. This sweeping statement is overbroad and ignores entirely the important issue of context. The GAC Advice provides no principled basis for understanding why some strings are included and others are not. For example, as specified by the GAC, the “Health and Fitness” category includes: .care, BUT NOT .help; fit BUT NOT .yoga or .coach; .clinic BUT NOT .salon”
- “...we firmly believe that ALL strings should operate in a way that is consistent with applicable laws. There is no logical reason for a limited number of strings to be singled out.”

General support of category 1 safeguards 6-8

Selected citations

DotMedico TLD Inc.:

- “We also agree with the GAC that certain strings are associated with market sectors which have clear and / or regulated entry requirements in multiple jurisdictions, and that additional safeguards should apply to this sub-set of strings.”

Dot Beauty LLC

- “While admittedly a highly restrictive approach to registration, perfectly permissible by the rules of the Guidebook, translating established practices from the offline world to the registration process of domain names where possible and practical offers separation and innovation for the Registry Operator. While not specifically cited by the GAC as rationale in its Beijing Communique, the GAC has stated innovation by registry operators is a public interest goal of gTLD expansion to be later evaluated. Where the GAC has cited specific strings for the need of additional safeguards, such as the case for .CASINO, offers the ICANN Board and community the opportunity to consider those applicants that have proposed innovative solutions to potential public policy concerns.”

Dot Home LLC

- “Further, for .HOME, we think it is prudent for the registry operator to verify registrant credentials at the time of registration such as we’ve described doing in response to Question 18; to consult with an authority in case of doubt with regard to the authenticity of such

credentials; and to conduct periodic checks post-registration to ensure registrant validity and compliance consistent with such credentialing requirements.”

General concern or opposition of category 1 safeguards 6-8

Selected citations

Amazon

- “the Communiqué goes further to caution that certain strings – though not specifically identifying them – should be subject to validation and verification of second-level applicants’ licenses and credentials. In addition, the Communiqué proposes that registries should obtain input from relevant regulatory bodies and/or by “industry self-regulatory bodies,” in connection with safeguards to protect those industries and their consumers. Hence, the Communiqué would give de facto “regulatory” rights to non-governmental “industry self-regulatory” bodies. Such a policy might force private entities – registries and businesses operating at the second- level –to obtain government approval over their business models. Again, this principle is not required under most national laws.”

Donuts

- “[6-8] place registrar duties upon the registry. More importantly, they restrict registry operations in a way that might be unworkable in many circumstances.”
- “TLDs can target different registrants other than licensed professionals. TLDs such as .CASH, .LEASE and .HEALTH can be safely operated without onerous conditions or restrictions.”
- “Donuts advises the Board that these requests present significant operational difficulties:
 - They significantly change the registration experience of the end-user, from the ability to register a name now to requesting a name and having it granted only after permission is secured from one of potentially thousands of bodies with interests in regulating speech and content.
 - They may violate data protection and privacy laws in multiple jurisdictions.
 - They would require the cooperation of governments and other authorities, as well as the above-mentioned thousands of various credentialing bodies, to secure private identity data and provide it to registrars.”

Famous Four Media

- “We are extremely concerned with the recommendations in this section and ask the ICANN Board to reject them. These recommendations go well beyond our interpretation of the GAC advice as defined in the Guidebook as “the process for GAC Advice for New gTLDs is intended to address applications that are identified by governments to be problematic, e.g., that potentially violate national law or raise sensitivities.””
- “Registrars, not registries have direct interface with registrants. A registry operator has no knowledge of who the registrant is until after the registration has been confirmed. It would be impossible in the 3 tiered domain registration systems for a registry to perform these checks without significantly upending the registry/registrar model.”
- “These recommendations are seeking to turn registries into a police force for various licensing agencies across the globe. Yet no such requirements exist in the offline world. For example, real estate agents are not required to check the purported credentials of incoming tenants, printing companies or the operators of printed matter which carry advertisements are not required to check the credentials of those persons or entities for whom they publish adverts. There would seem to be little or no distinction between these examples and the online marketplace.”

NU DOT CO LLC

- “In three additional safeguards above, however, the GAC is not giving advice related to applicant accountability. Instead it is creating general policy based on the overly broad and simplistic assertion that all of these strings relate to market sectors that have clear and/or regulated entry requirements. Whether or not any of these Safeguards can be implemented

in a practical manner is very much in doubt. Most Registrants for domains are individuals, unaffiliated to regulated bodies and operating without “charters or licenses”. Usually, they’re just people with an extremely basic idea in their head and a desire to register a domain just in case they ever work out that idea.”

United TLD Holdco Ltd.

- “... the GAC Advice as articulated in these three additional Category 1 Safeguards should be wholly rejected...”

Category 2 Safeguards

The GAC advised the Board certain strings (like those in category 1) should have restrictive registration policies and that for strings representing generic terms, exclusive registry access should serve a public interest goal.

Nearly 50 unique applicants representing almost 400 applications commented on the category 2 safeguards. Of unique applicants, approximately 48% expressed support for restricted access policies with approximately 20% expressing concern or opposition. Regarding exclusive registry access for generic terms, approximately 58% of unique applicants expressed support whereas 24% expressed concern or opposition. The remainder who commented on this topic were generally neutral in their position.

General support of category 2 safeguards

Selected citations

Charleston Road Registry

- “CRR’s application for .CPA is a “restricted access TLD model”. Restricted access TLD model means we have committed to enhanced levels of protection and eligibility verification as part of the registration process for this TLD.”

Dot Home LLC

- “We agree with GAC advice with regards to Restrictive and Exclusive access.”

Medistry LLC

- “The Cleveland Clinic is unquestionably recognized and associated with trust and professionalism in the provision of care, research and education in the medical field. Extending this trust and professionalism to the operation and registration policies of the .MED gTLD, as captured by the mission of the Cleveland Clinic and stated purpose of the .MED gTLD, is for serving a public interest goal.”

DotMusic / CGR E-Commerce Ltd

- “ We agree that applications for sensitive strings (such as .MUSIC, .TUNES, .SONG and .BAND.) without enhanced safeguards that protect copyright as well as appropriate policies that do not proactively protect intellectual property and mitigate abuse should be disqualified. Furthermore, we fully agree with GAC’s assessment on the issues of exclusive and restricted access to TLDs. If legitimate members of a community are excluded from registration that would constitute material harm to the legitimate interests of a significant portion of that corresponding community. Any application that is not inclusive of all legitimate constituents, such as “Do-It-Yourself” artists or music fans, creates a likelihood of material harm, anti-competitive issues and unfair discrimination, and should be disqualified.”

General concern or opposition of category 2 safeguards

Selected citations

DotBook, LLC (this same language was included in many applicant responses)

- “DotBook, LLC believes that the domain name space should be operated in an open manner and that consumer choice and access is of paramount importance for the success of all new gTLDs. Any unduly burdensome restrictions on registrants or registrars should be avoided. Placing registration requirements or restrictions on some new gTLDs and not others will unfairly prejudice these new gTLDs when launched into the consumer marketplace.”

NU DOT CO LLC

- “All of NU.CO’s applications propose strings are operated in an open manner. However, this is our personal preference and philosophy. This is not and should not be a policy as it would be newly introduced at this very late stage in the program. We refer again to our comments above regarding timing and introduction of policies in a top-down, non-consensus driven approach as being completely opposed to the fundamentals upon which the ICANN community has been built.”

United TLD Holdco Ltd.

- “Placing registration requirements or restrictions on some new gTLDs and not others will unfairly prejudice these new gTLDs when launched into the consumer marketplace. United TLD plans to offer .NAVY as an open top level domain space without restricted or exclusive access in order to allow registrants to create innovative and specialized products and services that connect with their military-service audience (for example, “surplus.airforce”)”

The Goodyear Tire & Rubber Company

- “The GAC Advice articulated for Category 2 (Restricted Registration Policies), Sub-category 2 (Exclusive Access) gTLDs is overly broad and reads more like a mandate than advice on how to responsibly regulate and govern the issuance of new gTLDs. Without more detailed advice about considerations and mechanisms that could be used to decide whether a string will serve “public interest goals,” acceptance of this piece of GAC Advice would set a dangerous precedent that it is acceptable for the GAC to issue mandates after the policy-making process and not provide specific recommendations and inputs during policy formulation stages.”
- “The Goodyear Tire & Rubber Company recommends that the ICANN Board of Directors reject the GAC Advice requiring exclusive registry access to serve a public interest goal for strings representing generic terms.”

Open Universities Australia PTY Limited

- “We are concerned by the GAC’s position that “...strings representing generic terms, exclusive registry access should serve a public interest goal.””
- “The GAC is adding de facto application requirements for New gTLD applications that may adversely affect an applicant’s ability to secure and fully utilize the gTLD for the purpose they intended. Applicants, such as Open Universities Australia PTY Limited, reasonably relied on and made a decision to apply for a gTLD, like in our case .courses, based on the requirements outlined in the ICANN New gTLD Applicant Guidebook (“AGB”). Prior to launch of the New gTLD Application Window in January 2012, the AGB had gone through several years of extensive community policy debate and revision, in which the GAC was privy and actively took part.”...“Addition of such criteria at this late stage is not only unfair, but also significantly undermines the ICANN bottom-up, multi-stakeholder, consensus policy development process.”
- “The determination of whether a string serves a “public interest goal” is subjective and lacks universal meaning and determination criteria, which will result in inconsistent determinations and repeated conflict among private and public stakeholders.”
- “...has the potential to cause unreasonable delays in final gTLD application determinations due to its broadness and lack of specificity.”

Other Themes Arising from the Responses

The below are elements contained in the responses to GAC Advice that do not neatly fall into the GAC Advice Framework but are raised here as recurring themes or worth mention. Each is discussed further below.

1. GAC Advice contrary to multi-stakeholder model
2. Program delays and Implementation issues
3. Opposed to categorization or mis-categorized
4. Request to update response after board consideration
5. Change request process

GAC Advice Contrary to Multi-stakeholder Model

Of the over 400 applications representing responses on the stakeholder model, a large majority of unique applicants (>80%) expressed concern that the nature of the GAC Advice undermines the multi-stakeholder model. Related, many also suggested that elements of the advice are outside of the GAC's remit as defined in the AGB. Also, applicants expected advice against specific strings based on individual applications and not against broad groupings of strings.

Selected citations

Amazon EU S.Ã r.l.

- “Retroactive changes, based on guidance that the ICANN Community already has rejected, fundamentally undermine the multi-stakeholder model.”
- “Applicants relied on the AGB Provisions on Geographic Names. The Communiqué now backs away from more than four years of multi-stakeholder work on the geographic name issue by its new attempt to isolate strings that raise geographical issues. This action is disruptive (not only for us and our applications) because the effect is not dissimilar to that of consensus Communiqué advice but without the essential component of consensus. “
- “The Communiqué Chips Away at the Multi-Stakeholder Model. In the interim, none of the representatives from Brazil or Peru have implemented any of the variety of protections previously agreed through the multi-stakeholder process. For example, neither representative filed a Community objection although both countries were well aware of this option (each has been an active member of the GAC dating to 2008).
- “Although likely unintended, the Communiqué, as written, will allow the GAC to create new regulations and overturn the sovereign laws of other countries, undermining the multi-stakeholder process and giving credence to arguments in other forums that national governments should have a controlling role in Internet governance. Accordingly, we urge the Board to reject certain aspects of the Communiqué and adhere to the principles originally agreed to in the AGB by Applicants, ICANN, and the Community. “

Asia Spa and Wellness Promotion Council Limited

- “The integrity of ICANN and the new gTLD process is at stake.”
- “Where appropriate and especially where having a choice, ICANN should approve applications that demonstrate their integrity in standing by their proposal as originally

submitted and willingness to participate and respect the ICANN multi-stakeholder bottom-up process, including advice from the ACs.”

DotHealth, LLC

- “The GAC with its very wide set of advice appears to contradict many of the principles and requirements set forth by ICANN in the Applicant Guidebook (“AGB”) for the gTLD program. If the board were to accept all the GAC advice this would materially impact applicants businesses including revenue and cost projections. The principles and rules developed by ICANN were developed during years of bottoms up consultation within the community and should be adhered to unless there is a compelling reason to deviate.”

Allstate Fire and Casualty Insurance Company

- “AFCIC believes that the Board should not consider the recommendations in Section IV(b) and Annex 1 of the GAC Communiqué as part of the gTLD evaluation process for the application for .CARINSURANCE because (1) the recommendations are untimely under the clear language of the Applicant Guidebook (“AGB”); (2) they are broad policy recommendations not recognized by the AGB as GAC advice related to new gTLD applications that can be considered by the Board; and (3) the Board’s adoption of these recommendations at the end of the application process would essentially rewrite the AGB and impose significant unexpected additional costs and obligations on many applicants who relied on the existing contractual framework.”

Monash University

- “We are disappointed and concerned that the GAC has chosen to step beyond its agreed remit and issue the broad, generic Beijing Advice covering all new gTLD applicants. Module 3 of the Applicant Guidebook, states that “the process for GAC Advice for New gTLDs is intended to address applications that are identified by governments to be problematic, e.g., that potentially violate national law or raise sensitivities.” We believe the provision of the Beijing Advice covering all new gTLD applications represents a material change to the scope and purpose of the Advice which was to have been provided. We see no reason why the Beijing Advice was not confined to targeting specific applications as originally (and reasonably) expected.”

Giving Limited

- “In short, we are both disappointed and frustrated that the GAC has chosen to step beyond its agreed remit and issue the broad, generic Beijing Advice covering all new gTLD applicants. Module 3 of the Applicant Guidebook, states that “the process for GAC Advice for New gTLDs is intended to address applications that are identified by governments to be problematic, e.g., that potentially violate national law or raise sensitivities.”
- “We believe the provision of the Beijing Advice covering all new gTLD applications constitutes a material change to the scope and purpose of the Advice, which was to have been provided. We see no reason why the Beijing Advice was not confined to targeting specific applications as originally (and reasonably) expected.”

DotHealth, LLC

- “Too broad & need more clarification”

Merchant Law Group LLP

- “We believe elements of the Beijing GAC Communiqué require further clarity or amendment and request that the ICANN Board provide applicants with additional guidance before requiring or requesting any applicant to alter their applications or business models.”

KBE gTLD Holding Inc

- “We cannot emphasize enough that KBE is fully prepared to comply with all directives from the Board related to these issues. That said, no applicant can move forward without additional input from the GAC and the Board on these issues. We now respectfully request that the Board provide clarification, additional guidance and/or actionable directives on: (i) the ultimate determination that the safeguards articulated in the Advice are necessary for

the advancement of the entire new gTLD program, (ii) how such safeguards will be applicable and enforceable to all applicants in a fair, reasonable and actionable way; and (iii) the process by which such safeguards and their applications will be implemented, remediated and/or enforced from an administrative and operational perspective.”

Aesthetics Practitioners Advisory Network Pty Ltd)

- “In short, we are both disappointed and frustrated that the GAC has chosen to step beyond its agreed remit and issue the broad, generic Beijing Advice covering all new gTLD applicants. We believe the provision of the Beijing Advice covering all new gTLD applications constitutes a material change to the scope and purpose of the Advice which was to have been provided. We see no reason why the Beijing Advice was not confined to targeting specific applications as originally (and reasonably) expected. We, and no doubt others, are understandably aggrieved at the continued shifting landscape, one which is quite outside the conditions under which our application was submitted. That being the case, we are faced with a choice between a lesser of two evils. The new gTLD program has been subject to repeated and substantial delays and the present issue threatens to add to such by at least a further 3-6 months were the Beijing Advice to be rejected in whole or in part. Conversely, to avoid delay, we are being asked to agree to provisions in the Registry Agreement (“RA”) that appear at first instance to be both ill-defined and over broad. The RA itself now rather resembles a contract of adhesion-we are in the territory of take it or leave it.”

Program delays and Implementation issues

Many applicants expressed concerns regarding the impact of the GAC Advice on the program timelines – that taking the time to properly respond to the advice would cause undue program delays. There were also concerns that elements of the advice are simply not implementable and requested the Board provide more detailed and actionable directives.

Selected citations

Amazon EU S.Ã r.l.

- “Changing direction at this time undoubtedly will result in delays for all applicants, and raise legal issues.
- “The Communiqué Guidance on Public Interest Goals isn’t Implementable. Amazon agrees that all registry operators should abide by relevant applicable laws, including those relating to consumer protection and competition, and that registry operators require in their acceptable-use policies that registrants comply with all applicable laws, particularly in relation to privacy, data collection, and child and consumer protection. The Communiqué, however, appears to go one step beyond and requires registries and, by association, registrars and users of the Internet (through their registration agreements and use of second level domain names in the new gTLDs), to institute policies and procedures not required by law and, in some instances, which may be interpreted as being in direct opposition to national laws (for example, circumventing national laws that may grant safe harbors to neutral platforms). This process would act as a material change to the AGB and, as such, requires a full vetting by the entire ICANN Community. We also request that the Board reject this section of the Communiqué.”
- “Applicants and the Board have no way to comply with or implement this Communiqué; thus, the Board should not adopt this safeguard, however well-intentioned.”

GMO Registry, Inc.

- “GMO Registry supports many of the tenets of the policy advice contained in the April 2013 GAC Beijing Communiqué and has already incorporated many of the same principles into our vision for a .INC namespace, as demonstrated in the publicly available policy section of our

new gTLD application. We also express a willingness to examine ways in which any advice the ICANN Board decides to take on, may be adopted into the operating policy for .INC through Public Interest Commitment Specifications or other means. That said, we have serious reservations about introducing new policy requirements at this stage of the process, the disadvantage it may cause new gTLD operators in competing against legacy TLDs who are not subject to the same requirements, and that adoption of the GAC's advice would cause significant further delays to the introduction of new gTLDs."

.music LLC

- "Despite the fact that the .Music LLC. application meets the GAC criteria that are associated with the .music string, we recognize that the GAC document must be discussed in the community before it can be implemented but we hope that the new gTLD process will move forward as planned and not be delayed. We therefore urge the board to withstand requests for any further changes, and or delays."

KBE gTLD Holding Inc

- "That said, there are portions of the Advice that are incomplete, vague and impractical and require additional guidance to effectuate compliance by applicants. For that reason, in response to the Advice, the Applicant respectfully requests that the Board utilize the multi-stakeholder model used in the past to address the issues raised and provide more detailed and actionable directives on these issues."

Opposition to Categorization or Mis-Categorized

Many applicants expressed concerns regarding applying categories to strings, stating that this had been previously considered and rejected. Applicants also expressed concern or disagreement with having been placed in certain categories.

Selected citations

dotHIV gemeinnuetziger e.V.

- "However, we believe our application has been erroneously included in the Communiqué's "Category 1: Consumer Protection, Sensitive Strings, and Regulated Markets", sub-category "Health and Fitness." We are specifically concerned this erroneous inclusion in Category 1 might delay the delegation process of dotHIV and therefore kindly request to reconsider this categorization."

Allstate Fire and Casualty Insurance Company

- "Furthermore, the GAC Communiqué seeks to create categories and subcategories that have no basis whatsoever in the AGB, which only specifies two types of applications: community-based and non-community based. The AGB makes no mention of, or distinction between, restricted or unrestricted TLDs because the AGB allows each applicant to set its own registry restrictions and business models in order for innovation and competition to flourish. Similarly, the General Safeguards, Category 1 Safeguards, Regulated Sector Safeguards, Restricted Access Safeguards, And Exclusive Access Safeguards have no basis whatsoever in the AGB. If the Board adopts the categorization and safeguards recommended by the GAC Communiqué, it would constitute a fundamental rewriting of the AGB and framework for new gTLDs at the end of the gTLD application process after applicants have developed business plans and expended significant amounts of time, resources and money in reliance on the existing framework."

NU DOTCO, LLC

- "The GAC considers that Safeguards should apply to broad categories of strings...in the current or future rounds, in all languages applied for. While the GAC's intent to divide strings into categories is a noble effort, we believe that this is a difficult, if not impossible task to undertake in a fair, consistent and transparent manner. Strings have multiple meanings,

different applications to different users in different markets, etc. They do not easily fall into categories and therefore we are opposed to the categorization of strings. Neither the AGB nor the gTLD program was created with this concept in mind and in this stage of the process, this would materially impact the rules and regulations that applicants submitted to and were developed during years of bottoms up consultation within the community. Additionally, a quick review of the strings that have been included and excluded demonstrates the degree to which the GAC Advice lacks consistency and fails to reflect the kind of objective, principled basis that is fundamental to equitable implementation.”

Amazon EU S.à r.l.

- “Additionally, the Communiqué has used a very broad brush to label a variety of strings as “sensitive strings” under a variety of subclasses. These strings, listed as non-exhaustive, could, in fact, cover all applicants. We are concerned that labeling strings as “sensitive” could subject registry operators to heightened, unintended legal standards in various jurisdictions. In addition, the “categorization” of strings appears to be arbitrary. For example, the category “intellectual property” includes the strings “.FREE,” “.FANS,” “.DISCOUNT,” and “.ONLINE”. Indeed, based on these examples, any string that represents a generic term could be identified as “intellectual property.””

Donuts

- “Categorization, as proposed by the GAC is overbroad and unworkable. Applying safeguards according to categories of gTLDs is problematic, was previously rejected in community work and by the Board, and would limit new gTLD benefit and utility. “

The Weather Channel, LLC

- “TWC contends that the GAC’s categorization of .WEATHER as a generic term is incorrect. However, even if the Board were to disregard trademark registrations issued by GAC member states and consider the .WEATHER gTLD as a generic term, the limited restricted registry access contemplated by TWC serves several public interest goals, as discussed below.”

Requests to update responses after board consideration

Many applicants were responding directly to the advice in defense of their applications and, foreseeing subsequent decision-making, specifically requested that they have another opportunity to respond based upon ultimate outcomes.

Selected citations

Top-Level-Domain S.a.r.l

- “We were asked to provide a statement to the GAC Advice without knowing the decision by the ICANN New gTLD Program Committee. Therefore Hotel Top -Level-Domain Sarl reserves the right to supplement the answer to the GAC Advice with additional or amended commitments based on community feedback including the GAC.”

I-REGISTRY Ltd., Niederlassung Deutschland

- “I-REGISTRY LTD. reserves the right to supplement the answer to the GAC Advice with additional or amended commitments based on GAC and community feedback. We’re asked to provide a GAC Advice Response Form for Applicants statement to the GAC Advice without knowing the decision by the ICANN New gTLD Program Committee. Therefore we reserve the right to limit our statements to those being approved by the ICANN New gTLD Program Committee.”

dotBERLIN GmbH & Co. KG

- “However dotBERLIN GmbH & Co. KG reserves the right to supplement the answer to the GAC Advice with additional or amended commitments based on GAC and community feedback.”

Change Request Process

Should applicants ultimately be required to make changes to their applications as a result of the GAC Advice, there is concern that the current change request process is not appropriate for handling such requests. Staff agrees this is an important topic to be addressed.

Selected citations

Aremi Group S.A.

- “The change request process in its current form is not an appropriate mechanism for making any application alterations that could be required by the Beijing GAC Communiqué. We believe changes made through this process will slow the approval of applications with strings that fall under “Category 1” of Annex 1 and this will jeopardize the integrity of the prioritization drawing system.”

Top Level Design, LLC

- “We request guidance from the ICANN Board regarding any unique way of incorporating GAC Advice other than the change request process outlined in the Applicant Guidebook. We are concerned that the change request process will significantly affect the timing for signing our Registry Agreements and launching our TLDs. We encourage the Board to develop a model that addresses these very serious timing concerns.”

Summary of GAC Advice Response from DotConnectAfrica Trust (DCA Trust)¹

Applicant ID: 1-1165-42560

String: .AFRICA

The applicant expresses “great disappointment and outrage” over the objection and urges the Board to permit its application to proceed. The applicant asserts that it has not been afforded due process as the GAC did not address the concerns the applicant raised when responding to the GAC Early Warning. Further, the advice contravenes the multi-stakeholder process and the transparency and accountability requirements, and is “against the explicit commitment to fair competition as enshrined in the Core Principles.” The applicant notes that it has escalated this matter to the U.S. Congress.

The applicant proposes that ICANN should continue processing its application, and if it passes Initial Evaluation, the applicant will engage in negotiations with the African Union Commission. The applicant’s response questions the authenticity of the political support for UniForum’s .AFRICA application citing that no African government has endorsed UniForum by name. The applicant maintains that accepting the objection advice would impermissibly delegate to African governments the Board’s authority to determine how new gTLDs should be delegated. The applicant further urges the Board to reject the advice because of its assertions that: (1) there was no GAC consensus (only 61 of the 120 representatives attended the Beijing meeting), (2) the participation of Alice Munyua was “highly inappropriate, deceitful and irregular” as her GAC tenure had expired, and (3) the advice was received nearly one month after the applicable deadline for the submission of objections to applications.

¹ This document contains a brief summary of the applicant’s response to GAC advice. The full text of the applicant’s response can be accessed at: <http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-1165-42560-en.pdf>.

Summary of GAC Advice Response from GCCIX WLL¹

Applicant ID: 1-1936-21010

String: .GCC

The applicant requests the Board to disavow the GAC advice and instead defer to the WIPO legal rights objection (LRO) process initiated by the Cooperation Council for the Arab States of the Gulf (CCASG). The applicant argues that the GAC advice is “untimely and is therefore not legitimate” because the GAC did not submit comments by the close of the objection filing period (i.e. 13 March 2013) as required by the AGB. The applicant asserts that there is no evidence to support CCASG’s position that GCC is an IGO and that the .GCC string has an internationally legally recognized link to the CCASG because the GCC is not established by treaty (i.e. the CCASG treaty makes no reference to “GCC,” “Gulf Cooperation Council,” or the string “.GCC”). The applicant’s response provides trademark information to demonstrate its rights to use the GCC string.

The applicant notes that while the CCASG filed a LRO to its application, it could have also objected on community grounds, but did not do so. As a result, “it surely cannot be appropriate to consider or uphold a complaint on the same grounds [community] via the GAC and Board path.” The applicant wants to proceed with a full and fair hearing on the LRO with WIPO and notes that the New gTLD process was well designed to allow for exactly the sort of challenge that its application received, and the Board should adhere to the established process.

¹ This document contains a brief summary of the applicant’s response to GAC advice. The full text of the applicant’s response can be accessed at:
<<http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-1936-21010-en.pdf>>

Summary of GAC Advice Response from Asia Green IT System Bilgisayar San. Ve Tic. Ltd. Sti.¹

Applicant ID: 1-2130-23450

String: .ISLAM

The applicant notes that the advice on .ISLAM is specifically worded and must be carefully considered as it does not represent GAC consensus advice. The advice “cannot be considered as anything more than individual opinions being expressed by at most a few GAC members.” The applicant indicates that it is ready to engage with the Board to help it complete the process described in AGB Module 3.1. The applicant’s response includes a description of the measures it has taken to “ensure Dot ISLAM meets the highest possible standards of quality.” The applicant provides a list of its ongoing outreach activities undertaken to ensure support from the Islamic community, including creating a Dot Islam Policy Advisory Council, which would exercise an oversight function in the TLD’s operations in areas such as registration policies, dispute resolution and content monitoring. The applicant notes the importance of the Independent Objector’s opinion that an objection on the limited public interest ground is not warranted. The applicant believes the objections to its application are better resolved through the objection procedures and not through the Communiqué. The applicant’s response also includes a list of support received for .ISLAM.

¹ This document contains a brief summary of the applicant’s response to GAC advice. The full text of the applicant’s response can be accessed at:
<<http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-2130-23450-en.pdf>>

**Summary of GAC Advice Response from Asia Green IT System Bilgisayar San.
Ve Tic. Ltd. Sti.¹**

Applicant ID: 1-2131-60793

String: .HALAL

The applicant notes that the advice on .HALAL is specifically worded and must be carefully considered as it does not represent GAC consensus advice. The advice “cannot be considered as anything more than individual opinions being expressed by at most a few GAC members.” The applicant indicates that it is ready to engage with the Board to help the Board complete the process described in AGB Module 3.1. The applicant’s response includes a description of how it plans to create a “quality namespace for the Muslim faithful and those who wish to learn about our culture and religion,” and references letters of support for its application from the media, civil society, religious organizations and leaders, public figures and NGOs. The applicant indicates that it has been in contact with the Islamic Chamber Research and Information Center and the Organisation of Islamic Cooperation, and has provided them the opportunity to participate and comment on the applicant’s plans for .HALAL. The applicant’s response also includes a list of support received for .HALAL.

¹ This document contains a brief summary of the applicant’s response to GAC advice. The full text of the applicant’s response can be accessed at:
<<http://newgtlds.icann.org/sites/default/files/applicants/23may13/gac-advice-response-1-2131-60793-en.pdf>>