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Cherine Chalaby  
Chair, New gTLD Program Committee  
Internet Corporation for Assigned Names and Numbers  
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Los Angeles, California 90094

*via email to [cherine.chalaby@icann.org](mailto:cherine.chalaby@icann.org)*

July 27, 2014

**Re: letter of RySG, IPC and BC on Rights Protection Mechanism to Name Collision Blocklists**

Dear Mr Chalaby, dear members of the NGPC,

First of all, we would like to express our support for the letter sent July 17, 2014 on behalf of the RySG, BC and IPC. Although there has been no formal vote on this proposal, we appreciate the initiative taken and outcome.

However, we would like to note that while this proposal serves the needs of both rights owners and registries, we are concerned that registrants might get confused. As we've experienced ourselves, registrants are crucial for the success of the gTLD program and their needs to be taken serious. Many of them do not understand the reasons for reservation and block lists and under which TLDs they can register, allocate or not register names from these lists. Having said this, the goal should be to simplify and unify the release for name collision names across all gTLDs. Therefore, some implications of this proposal need a more thorough analysis:

- The proposal does provide uncertainty to registrants into which category a gTLD falls and thus lacks guidance which rights protection mechanisms are available.
- The proposal has not been agreed-upon by the ICANN community at-large, in contrast to the development of the RPM rules where the community was involved.

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Therefore we ask ICANN to thoroughly evaluate the proposed model and we propose that:

- ICANN, together with the community, extend the existing RPM rules for the allocation and activation of APD names.
- ICANN takes into account the different registration models and phases of existing and future gTLD operators.
- ICANN together with the community al-large develops a set of common rules, valid for all gTLDs.
- Those common rules should apply to both, already delegated gTLDs and not-yet delegated gTLDs, to avoid registrant confusion.
- Provide Registries with a limited timeframe to either stay with their existing policies or develop new one for the allocation and activation of names of their APD list under the to-be-developed RPM rules.

We kindly ask the NGPC to take these issues into consideration.

With best regards,

I-REGISTRY Ltd.

- sgd. Anselika Smoljar -