



7 July 2016

Internet Corporation for Assigned Names and Numbers (ICANN)
Los Angeles, California
United States of America

Dear ICANN,

Child Rights Coalition Asia (CRC Asia), a regional network of child rights and human rights organizations in Asia, is alarmed with the results of the Community Priority Evaluation (CPE) Report on the “.kids” domain. The report openly ignored the United Nations Convention on the Rights of the Child (UN CRC) and the definitions within the convention that describe the constituent stakeholder groups of the global children’s rights and children’s welfare community.

CRC Asia would like to express its disappointment on several grounds:

1. The report wrongly concluded that parents and children’s rights organizations should not be considered as part of a cohesive global kids’ community. In accordance with the UN CRC, *“the child, by reason of his physical and mental immaturity, needs special safeguards and care, including appropriate legal protection.”* Kids do not exist independently in the community; they are supported and represented by those who are no longer kids but are intricately involved with kids to protect, promote, and advocate their rights for their best interest and full development.

Together, kids (as defined by UN CRC that a “child” as a person below the age of 18, unless the relevant laws recognize an earlier age of majority), children rights organizations, state institutions, parents, and educators (as understood by the UN CRC and not simply a “collection of individuals and organizations”), form a coherent and well-established global children’s rights and children’s welfare community.

2. The report wrongly concluded that there is no entity mainly dedicated to the global children’s rights and children’s welfare community. The UN CRC, the most widely ratified international human rights treaty in history, is signed by 192 out of 193 UN Member States. It is the universal standard that represents and protects the rights of all children around the world. The United Nations Committee on the Rights of the Child (CRC), which has the responsibility to oversee the implementation of UNCRC, is a recognized entity for the entire global community in its breadth and depth.

3. There was lack of transparency on the composition and expertise on children’s rights of the evaluation committee. Information about the members of the evaluation committee was not available. Specifically, CRC Asia would like to know whether the evaluation committee had knowledge or experience with children’s rights or the UN CRC. The global children’s rights and children’s welfare community should include all concerned stakeholders, including children, civil society organizations, parents, educators, and educational institutions. The provided rationale from the

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Yayasan KKSP –
Center for Child
Rights Education
and Information

Yayasan SEJIWA

Malaysia
Protect and Save
the Children

Myanmar
Equality Myanmar

Philippines
Mindanao Action
Group for Children’s
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Thailand
The Life Skills
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CPE report appears to demonstrate that the evaluation committee has limited knowledge of the UN CRC and children's rights principles and concepts. ICANN must not act upon such report without properly consulting with experts within the community for which the ".kids" global namespace will have a direct impact on.

4. **Children represent a delineated community from the populace at-large and require special protection.** The fact that there is a UN CRC independent from the Universal Declaration of Human Rights demonstrates clearly the delineation of the community and the need for special consideration for children worldwide. Many of the articles in the UN CRC point out the importance of safeguarding the rights of children in settings that affect them. This is the rationale behind the special rules in schools, playgrounds, and other settings. Given that cyberspace is one of the settings that children are involved in, the namespaces such as ".kids" must not be equally run the same way with ".sex" or ".shop," without any additional safeguard considerations to children.

As part of the children's rights and children's welfare community, CRC Asia have first-hand understanding of the special needs of children and the responsibility of society as a whole to safeguard these unalienable rights.

Children are, undeniably, impacted by policy decisions resulting from processes wherein their right to participate was not fulfilled. When this happens, the society needs to step in to advocate on behalf of the children's best interest.

CRC Asia urges ICANN to reconsider its decision on the ".kids" domain. ICANN is in a unique position to protect the rights of children in cyberspace. Allowing ".kids" to free fall into commercialized branding openly disregards the fundamental rights enshrined in the UN CRC. The costs to society of failing its children are far-reaching. Consequences of inaction, especially when failure is preventable, are quantifiable.

Thank you very much and we are looking forward to your immediate action.

Sincerely,

Amihan Abueva
Regional Executive Director
Child Rights Coalition Asia (CRC Asia)