



Internet Corporation for Assigned Names & Numbers
4676 Admiralty Way
Suite 330
Marina del Rey, CA 90292
USA

20 June, 2008

Re: Proposal 2008006: Release/Allocation of Single Character Domains in .mobi

Dear Patrick,

Thank you for your letter of 13th June regarding dotMobi's recent proposal for the release / allocation of single character .mobi domains.

As described in dotMobi's request to ICANN, single character domains present a particularly relevant and beneficial opportunity for the dotMobi community in particular, where names with shorter keystrokes have huge appeal in the context of mobile devices. Although dotMobi has seen significant growth since its launch in 2006, the TLD is still in its infancy and quality content is critical at this stage in the lifecycle of the domain and the mobile Internet in general. For this reason and after extensive consultation with its sponsored community, including the .mobi Advisory Group [MAG] and Policy Advisory Board [PAB], dotMobi believes that single character names within the dotMobi space should be allocated using a Request for Proposals (RFP) process as opposed to auction.

dotMobi is not adverse to auction models per se. In fact, as the first Registry to integrate Premium Name auctions into its business model, dotMobi has embraced this domain allocation tool. The Registry has used proceeds from auctions to build the many products and services now made available (at no/low cost) to the dotMobi community¹².

Based on its considerable experience of auctions, dotMobi also believes that the most appropriate allocation method for domains varies from situation to situation. Accordingly, dotMobi has also allocated certain Premium Names via a Request for Proposals [RFP] process to qualified players within the mobile market. This particular allocation model is a particularly effective means of making new content, new services and features available to mobile Internet users. These allocations also help promote growth, creativity and innovation in the market.

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² See <http://ready.mobi>, <http://dev.mobi>, <http://site.mobi>, <http://deviceatlas.com>, <http://mobithinking.com>, <http://mowser.mobi>



dotMobi's RFP process for allocating single character domains will rely on evaluation criteria designed to ensure that any award and registration results in the addition of high quality content to the dotMobi community. These criteria will be developed on the basis of dotMobi's unique experience of the mobile market and its plans for the dotMobi space. To be clear, dotMobi's sole objective of allocating the domains in this manner is to drive adoption and usage of the .mobi TLD. Accordingly, the only fee which RFP winners will pay is the standard, Registrar-levied registration fee.

dotMobi notes ICANN's acknowledgement within the Allocation Framework document now posted for public consultation³ that at a one-size-fits-all allocation approach to single character domains may not work for all Registries and that there may be variations proposed by certain gTLDs. dotMobi asks that ICANN respects the desire of the dotMobi sponsored community to release .mobi single character domains in a manner that will best serve the needs of that particular community.

More generally, dotMobi urges ICANN to remain flexible about the methodologies to be used by Registries to allocate single character names within the top level domains which they operate. The Allocation Framework document relies heavily on the OECD's work from 2004, *Generic Top Level Domain Names: Market Development and Allocation Issues* (13 July 2004). This paper, however, is specifically focused on the process by which **new** generic top level domains are allocated. It is not clear to dotMobi that the same analysis and considerations are in play with respect to the allocation of single characters within an existing TLD, whether generic or otherwise. Nor is it self-evident that the benefits cited by the OECD would flow from an auction of single character domains at the second level.

Finally, dotMobi believes that Registry Operators are more likely to understand the range of potential uses for single character names within the domain which they operate and are in the best position to identify the allocation method most suited to fulfilling that potential.

Yours Sincerely,

Caroline Greer
Director of Policy & Industry Relations
dotMobi

³ <http://icann.org/registrar/rsep/allocation-framework13jun08.pdf>