

# nameshop

Dear Mr Challaby and Mr Marby,

The new gTLD program included lofty and important goals that are inextricably intertwined with ICANN's mission and *raison d'être*. These include bridging the digital divide, establishing DNS access and establishing ICANN-contracted entities in developing regions, creating *global* competition and choice for consumers.

The failure of the new gTLD program to attain these goals reflects poorly on the program and ICANN itself, and casts doubt on the legitimacy of a next round.

In juxtaposition is the application for .internet, submitted by India-based Nameshop (a long standing member of the ICANN community) with a TLD application addressing the aforementioned goals.

I am writing to you to request your intervention to delegate .Internet to Nameshop, which has committed to operate the Registry in the global public interest, including the support and growth of Internet usage in developing regions. That application has been stopped by ICANN's reluctance to address the inequities in the application and evaluation processes as they have been applied to the Nameshop application:

- Nameshop first applied for .idn (the alpha3 country code for Indonesia). The lack of clarity in the TLD process made this an easy mistake to make as both Google and Donuts also applied for alpha 3 country code names – but losing a single TLD application did not have the same devastating effect for them.
- The applicant sought to change the string if the string .IDN could not be delegated, but, when a Change Process was finally made available, Nameshop applied to change the string to .Internet. Nameshop's request for change was denied in a process with many irregularities and despite the fact that other requests for string change were accepted. ICANN org's attempt to distinguish the Nameshop request from others was unsubstantiated and highly subjective at best.
- The Nameshop application for financial support was denied without rational or supporting documentation. There were only three applicants for support and the only application that "passed" was from a sophisticated applicant that already operates a TLD, a result that seems to clash with the very purpose of financial support.
- The Reconsideration processes were limited to a cosmetic review of whether certain processes were followed and refused to look into the substantive evaluation issues concerning the evaluation of the application, nor to the principles of natural justice. (This is a typical complaint of ICANN's review mechanisms.)
- The ombudsman was consulted but offered no constructive or substantive opinion.

- The IRP is prohibitively expensive for this applicant and is therefore unavailable to a typical developing region party. In any event, Nameshop seeks a cooperative (and not confrontational) solution towards the delegation of .Internet.
- Multiple cooperative engagement meetings between ICANN org and community members supporting the .internet application made no headway as the staff was not empowered to make decisions and ICANN has refused to admit error or wrongdoing, exhibiting a posture that might suit a commercial corporation rather than a global public interest non-profit Organization.

All this perpetuates the geographical and commercial status quo of the DNS business environment to deny fair evaluation of the new gTLD application by a small company from a developing country outside the DNS sphere, and missing an opportunity to accomplish some the the new gTLD program's goals. Amazingly, seven years have already been lost. For a complete timeline of all Nameshop activities see, <http://nameshop.in/progress>

I seek your support to delegate .internet to Nameshop whose Public Interest Commitments have always included to operate the string in such a manner that its Registry Operations would be of certain and significant value to ICANN, the DNS and the Internet and make those operations open for public review and comment. Specific details o Nameshop's commitments have been communicated to ICANN org.

Nameshop is available to present additional information or clarifications concerning the various merits of the Nameshop application, the public interest component and commitments in a meeting with the CEO and Board Chair at Kobe.

Thank you

Sivasubramanian Muthusamy  
Proprietor  
Nameshop

March 10, 2019  
Kobe, Japan.