

ECLID

European Cultural & Linguistic Internet Domains

8th June 2012

Dear New gTLD Programme Committee Members,

RE: New gTLD Batching process

I am writing on behalf of the ECLID Network (European Cultural and Linguistic Internet Domains) which currently represents the .bzh, .cat, .eus, .gal and .scot projects, with regard to the New gTLD batching arrangements. As a group, we are concerned by the ramifications this process may have on the ability of the organizations created to present a bid for a cultural and/or linguistic community-based TLD to achieve ICANN's stated aim to, according to the AGB, "open up the top level of the Internet's namespace to foster diversity".

While ECLID is not seeking preferential treatment for its members, it recognises that the batching process is unlikely to satisfy the needs of any applicant grouping. Particularly, ECLID believes that equal opportunities should be ensured for all applicants such that smaller gTLD projects are not disadvantaged and that the higher cultural and linguistic diversity of the Internet should be considered as a priority matter of public interest, per the AGB stated aim as noted above.

ECLID members are concerned that cultural and linguistic bids from relatively small public interest groups will, when compared to the predominance of commercial applicants, be disadvantaged through simple weight of numbers. This potential disadvantage may hinder those endeavours undertaken by the scores of volunteers that have committed their time and efforts to create the organizations and infrastructures necessary to run a successful bid, involving their respective civil society and public actors for the greater good of their respective Internet communities.

In order to address this, ECLID respectfully asks that your committee consider a modification to the batching process that would help ensure the various constituent groups are fairly treated in relation to their peers against their ability to deliver ICANN's aforementioned aim.

ECLID would suggest that in addition to the regional batching of applicants recently announced, further grouping is conducted based on a) the public interest; b) the ability of the applicant to foster diversity; and c) competitor landscape. This could easily be achieved without recourse to another batching round by simple analysis of each bid's nature and, if commercial, industry type.

We feel strongly that this would reduce any notion of unfairness and competitive imbalance while enhancing the chances of early delivery of a more open and diverse namespace.

Yours sincerely

Nacho Amadoz
Chairman

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