Dear Mr. Botterman,

On behalf of the BRG Board, I would like to thank you for your letter dated 21 May 2021 in response to the Brand Registry Group's (BRG) interest in proceeding efficiently toward the next application round of new generic top-level domains (gTLDs).

I note in your reply that the Board is still considering whether to initiate an Operational Design Phase (ODP) to provide the Board with information on the operational implications of implementing the recommendations presented by the Subsequent Procedures PDP WG. Considering the Sub Pro PDP WG completed its work at the start of the year, it was disappointing to hear at ICANN71 that progress has been limited to just the scoping of an ODP. This raises strong concerns about ICANN's ability to deliver the next rounds in an efficient manner, especially after ICANN Org began preparatory work two years ago – ICANN Org’s readiness to Support Future Rounds of New gTLDs – and prompts the question - Why isn't ICANN ready now?

Your reply also raised doubts as to whether significant demand exists for new gTLDs. Whilst it is not realistic or appropriate to reveal the intentions of potential applicants, the expectations of ICANN Org’s preparatory estimates (approximately 2000) would appear reasonable, especially if communication and outreach is conducted at an early stage. Proactive and early communication would also significantly improve the likelihood of attracting applications from underserved regions, for communities and TLD applications involving IDNs. A crucial part of generating demand – especially in underserved regions – is raising awareness early enough that potential applicants have time to generate ideas and plans.

At ICANN71 and during the BRG’s session “How Can ICANN Help Prepare New Entrants for the Next Round?” we not only heard the concerns from potential applicants regarding delays to implementing the next application round but also their ideas about how ICANN could be proactive now. In short, they recommended that the Board:

1. Instruct ICANN Org to issue a Preliminary Applicant Guidebook – potential applicants are not seeking a perfect version, they seek directional guidance to begin the internal conversations that prepare them for an application for a new
gTLD in the near future. This should not be complicated but should be based on the existing AGB, incorporating the additional processes adopted in the last round, such as Specification 13 and Public Interest Commitments, that have been affirmed and carried forward in the Subsequent Procedures outputs.

2. Commit to holding a new round of gTLD applications – begin now to raise awareness and reach out to organisations and underserved regions. This will maximise the time to communicate globally and support the goals of bringing the next billion users to the Internet and increasing the use of local languages and scripts.

3. Provide a sensible timeline for the next application window – this enables potential applicants to assess, plan and be ready to execute an application.

Olga Yagüez, from eBay, best summarised this in our ICANN71 session – “What we’d really like to see is a more intense effort from ICANN to be open about it, communicate what you are hoping and planning to do, make it live and interactive – but do it now, because the demand is there.”

Please consider these recommendations as part of your Board’s review and next steps in conjunction with the Operational Design Phase.

The BRG looks forward to seeing strong progress towards opening the next round of new gTLDs and preparing the path for new entrants.

Yours faithfully,

Heath Dixon
President
Brand Registry Group