



To: The Governmental Advisory Committee  
Cc: Chairman, Dr. Steve Crocker & The ICANN Board of Directors  
Mr. Akram Atallah, President, CEO  
Kurt Pritz, Senior VP Stakeholder Relations, and New gTLD Program Director

July 21, 2012

RE: The new gTLD program and the Public Interest

Dear Esteemed members of the Governmental Advisory Committee:

Thank you for providing new gTLDs applicants the opportunity to submit important communications to your membership by email. The New gTLD Program has been long awaited and recognized by The DotGreen Community, Inc. as a unique opportunity to provide valuable services in the domain name industry and as an engaged member of the Green Movement, to offer social, environmental, economic, and philanthropic benefits to the broader global society.

The world is watching ICANN launch new gTLDs. Many will not understand the complexities involved, yet await the new gTLDs with the excitement that comes with things that are new. The new gTLD program and those who administer it on behalf of ICANN, have an opportunity and a responsibility to recognize and allow for the *greatest Public Benefit* to prevail in the interest of the Greater Public which ICANN serves and will serve in the future. The new TLD program will stimulate the global economy, create consumer choice, promote healthy competition, promote Internet adoption, improve accessibility through IDNs, and allow for new business models to emerge, all while ensuring the stability and security of the Internet.

While this program stands to yield considerable value and long lasting benefits for people and economies for years to come, there may be a *risk of detriment to the Greater Public and the public's interests* by ignoring the creation of social, environmental, and economic components and failing to recognize, value created and promoted in some applications which by nature of their strings are specifically targeted for the Greater Public Good. Furthermore it is crucial that in the unique position to interpret and enable the program, you seek to avoid *detriment and potential harm to a public sector*. Those who act on behalf of ICANN and its Programs' goals are responsible to ensure that the new gTLD program, offers full potential in the positive interests of the Greater Public good and avoids detriment to the communities the Internet serves.

### **The .GREEN TLD**

GREEN is perhaps the only international word in the world that represents *a community, a cause, a movement, a lifestyle, and a business model* and its concept has been around for a long time – the “green movement” is global and far-reaching. It is a *cause* that has existed for decades and in recent years has had to fight to gain corporate acceptance which relies on transparency, trust, engagement, and much more in order to reach mainstream and global proportions. Its inclusivity is very broad in that governments, non-profits, NGO's, large corporations, small and medium businesses and individuals can be, and more importantly, are engaging to “go green.” It would be shortsighted to think that an operator of the .green TLD, without evidence in its application of having been intimately involved in this interested community over a substantial period of time, would position and operate the .green TLD in a manner that will bring Green and the Internet together primarily for sustainable Public Interests of the Green Movement.

### **Public Benefit**

A basic new gTLD application includes key areas of technical competence and financial strength in order to ensure the successful launch and operation of a TLD. But as stated by ICANN, it is in the public's interest that *Public Benefit* be a required and necessary part of its own operations and the entire New gTLD program and therefore each specific new gTLD. Public Benefit for an unusual TLD such as .green goes well beyond simply making a TLD available to a registry operator who in turns sells domain names. Public Benefit, particularly for a defined and existing *movement*, does not happen with a “flip of the switch” - it happens over many years of serving a *community* (the way ICANN does) through direct involvement, actions to advance a cause and the global gaining of support by being a valued part of a specific community. This happens in a variety of ways – 1) research and reaching out in all areas of the community, its people and mission, 2) participation in events worldwide specific to the movement introducing the concepts of the TLD and the people behind the TLD, 3) mass on-line communication and increasing of awareness via an active and vibrant website, informative newsletters and global social media out-reach and 4) actions which demonstrate ones belief and more importantly 5) adherence to the core values of both the movement and ensuring the values and business model of the TLD, as well as the string have been designed to match. Simply stated, an application to



ICANN that maximizes the Public Benefit aspect of the TLD string by putting the mission of the green movement first, building trust, including collaboration and cross sector partnerships in its application and real world practice greatly increases its chances for success and for “making a difference”.

### **Detriment**

An important area that ICANN and the new gTLD program guards against is the *potential negative impact or detriment* that a new gTLD, or an application with proposed operations of a new TLD, can bring to a community. A TLD string itself can bring *detriment* just by the nature of the string and its meaning. While, in the unusual case of an exceptional TLD string, it is the application by way of its operational model that can be deemed detrimental. In the case of the .green TLD, it is one of the most unique words in the world - it is internationally recognized and can never be substituted with another generic word or string as it is the only string with perfect nexus that is clearly suited to serve and benefit the GREEN cause, the GREEN community and the GREEN business model required and increasingly adopted by people across the planet for sustainability as well as the GREEN movement, a global movement of consequence. In this case there is much at stake if ICANN contracts the operations of an exceptionally unique and important new TLD to a business application that is identical to the construct of serving other strings, or is operated in a “sell more names” mode or even in the traditional single bottom line approach without appropriate and long term deep community engagement, philanthropy or understanding of the movement – that could be seen as a blatant disregard by ICANN of what this world-wide sustainability movement of consequence (even promoted by the United Nations) for mankind is all about.

Those running the new gTLD program have the authority and one single chance to act in the greater Public Interest for public benefit and veer away from detriment to ensure the .GREEN TLD will also be the Green Business role model TLD it promises by way of its name - to the global public well into the future, contributing philanthropy along the way. For the past five years DGC has promoted the .green TLD as well as the benefits the newgTLD program would bring to the global public. Without deliberate decision or intervention, the .green TLD may be won at ICANN Auction to join enmass with a slew of portfolio TLDs, blending into one of the many industry portfolios, a common business model ICANN’s new gTLD program has spawned. Without the signature Green business model, there exists a risk the target audience of .green will consider it a “green wash” by ICANN Further *risk of serious detriment* exists for a public benefit movement whose global community relies on the integrity of the word GREEN which has gained strength in recent years, yet remains sensitive and vulnerable to the term “green wash”. The Internet is a powerful global tool not to be used at the *detriment* of the public’s important global movement should ICANN appear to impose (or allow) the wrong business model (*a model missing the fundamental green structure; triple bottom line and philanthropy*) as the driving force behind its cause based string name and meaning.

### **DotGreen Community Inc.**

DotGreen Community Inc. (DGC) is one of four applicants for the .green TLD string. Its founder, a woman entrepreneur from outside the domain and Internet world was the first to propose .green to industry and environmental communities. She and her company have been intimately involved in all aspects of both the domain name world and the green movement for more than five years. Based in Northern California the team members, directors, advisors and financiers have been engaged and supportive of the GREEN movement for generations. **DotGreen Community, Inc. is the only .green applicant that has made a single application to ICANN, due to its mission and purpose of bringing together Green and the Internet.** It is also the only applicant who founded a “For Public Benefit Charity” Organization for the string; The DotGreen Foundation. The DotGreen Community may be the only applicant who designed a Public Charity Foundation (different than a private foundation) as part of its business model (see the DotGreen Community, Inc. application) to receive funding from every .green name sold for the purposes of worldwide sustainability projects, working closely with EarthShare, a 23 year highly respected Non-profit organization in the Green Community. It has gained the support of global followers and governments, it has actively engaged in the world of green, it has laid the groundwork with the domain name channel, it has an established team of individuals solely focused on .green and the benefits it can deliver and thru various worldwide events, has become respected and known as the trusted source for all things relating to the .green TLD. **DGC is the only applicant whose company’s primary purpose and mission IS the GREEN movement – this speaks to Public Benefit. It can afford this focus because it is the only applicant for .green who has contracted with a separate registry, to deliver proven technical capabilities, in addition it has subscribed to the Triple Bottom Line business model.** The DotGreen Community, Inc. IS a GREEN company designed to focus on the GREEN Movement for the GREEN Community. DotGreen’s proven technical solution is by contract with Neustar who has engaged in its own sustainability program and has made impressive progress initiating corporate green actions, earned

# .green

green awards in the Washington D.C. area, built a Leed certified Green Building for their operations, and co-sponsored the DotGreen “People and Planet” events at ICANN meetings. DGC has a sole focus on operating the .green TLD and serving that particular community in order to bring maximum benefit to the public with the .green TLD and has not applied for any other TLDs since there aren’t any which hold this important and exact international **nexus** to the GREEN Community, GREEN Movement, and to GREEN Business which The DotGreen Community, Inc. is so involved and is its primary purpose!

DotGreen Community, Inc. is uniquely positioned to bring success to the .green TLD because it recognizes the challenges facing a new gTLD and has an intimate knowledge specific to the GREEN cause, it’s Green Community, and Movement. DotGreen Community, Inc.’s application includes and explains in detail how the GREEN business model of both the company itself and the gTLD will bring the overall success ICANN is seeking with the three beneficial components– environmental, societal, and economic benefits which represent a “triple-bottom-line” approach that can be measured using traditional and emerging economic methodologies, and which is promoted by the United Nations. The triple bottom-line approach is also now being used by leading multi-national corporations in their design of GREEN business and organizational models for improved capital efficiency, reduced risk exposure, decreased shared costs through network efficiencies, as well as net social value creation and long term public benefits all over the world. This GREEN model for operating both the Registry AND the .green TLD **including its philanthropy** will lead to net benefits for registrars, registrants, end-users, future Internet users, green economies, green technologies, governments, people living in remote places, the environment itself and unborn generations to come.

## Summary

The purpose of this letter is to draw attention to you, as a GAC member and steward of ICANN’s Public Interests as they relate to the new gTLD program; *public benefit* and the *avoidance of detriment*; key points to guard for those endowed with this critical responsibility. This letter makes the appeal that a passive approach to not assess the glaring and missing components of the green business model for public interest and public benefit in an application for a string that holds that meaning, as well as to not take a close look at the approach of community management and engagement offered in those applications for such an important one of a kind TLD would most certainly lead to the *detriment* of the greater global public interest, the ICANN community and the New gTLD program.

The .green TLD is the only string with an exact nexus to GREEN, and GREEN is the only word in the world recognized across languages that pertains to the ever important worldwide sustainability effort. Those like you who are in a position to object, evaluate, or delegate should consider the obvious relationship of .GREEN with the Green Community, and the global Green Movement which represents net social benefits to include all people, their natural and synthetic environments, the economic systems they construct (such as *Green Business Models*), and conditions for future generations of life who stand to be affected by the choices we make, the policies we implement, and the projects we fund and allow to be born today.

In the case of the GREEN string in particular, The GREEN core values delivered by the DotGreen Community, Inc. are: **“primary purpose and mission of the company is forwarding the Green Movement”**, the **“triple bottom line Green business model”**, for **“the benefit for all people and planet”**, and integrated **“philanthropic partnerships for public benefit”**, **“cooperation with governments’ sustainability ministries”** are compelling mandates for the manager of the .green TLD and ALL are ONLY found in the application from DotGreen Community, Inc.

An application for the .green TLD which is void of offering these critical elements may lack the trust from the targeted audience or may have applied for a portfolio of other string opportunities and communities, and may not have designed or will deliver a custom approach required for the full potential of this once in a lifetime new gTLD opportunity. .GREEN can be a “shining star” for the ICANN New gTLD program, and for the world ! (as it may have been for the new gTLD program in development) - but only in the hands of a registry operator fully engaged and committed to global sustainability, one whose TLD interests are focused to look out for all people and our planet.

Sincerely,



Annalisa Roger, Founder/CEO  
The DotGreen Community, Inc.