Dr. Stephen D. Crocker  
Chairman of the Board of Directors  
Internet Corporation for Assigned Names and Numbers (ICANN)  
4676 Admiralty Way, Suite 330  
Marina del Rey, CA 90292-6601  
United States

Zürich, 27th June 2012

New gTLD Program; Batching and the Public Interest

Dear Dr. Crocker

The Canton of Zurich has applied for the TLD .ZUERICH. The intention is to provide a comprehensive vehicle through which the Canton may communicate with citizens, companies and organizations within its region as well as with companies and individuals worldwide who, in one way or another, interact with the Canton of Zurich.

We firmly believe this new TLD space will be of considerable benefit not only to the residents and visitors of Zurich, but also to businesses and corporations active within the region, as well as to the governmental offices and departments of the Canton, the City and the communities. Owing to the immediately recognizable nature of the TLD .ZUERICH and the anticipated easy-to-use structure of the sites embedded in it, we envision this TLD as a highly effective means to identify all things genuinely "Zurich".

We are writing to you today concerning the proposed batching procedure for the New gTLD Program. It is with great concern that we note the absence of consideration of the public interest in the procedure for building application batches.

As the guardian of the global public resource that is the Domain Name System, ICANN has the responsibility to ensure that a fair balance is maintained between public and private interests. In our view, the proposed batching procedure could upset this balance, bringing with it the risk that applications by applicants acting in the public interest may be excluded from evaluation for a prolonged period. At the same time, applications without any apparent regard for the public interest appear to be favored by the proposed "digital archery" system. As a case in point, applications in contention have a greater chance of being considered for the first batch, since multiple applicants are placed in a batch according to the best applicant's score.
We are confident that you share our view that the procedure is problematic within the standard of responsible public management.

We therefore urge ICANN to ensure that public interest geographic gTLD applications are not disadvantaged and given the legitimate priority to be approved within as short a time as possible.

Sincerely,

[Signature]

Ernst Stocker
Government Councillor
Head of the Department for Economic Affairs
of the Canton of Zurich

CC to:
BAKOM Federal Office of Communications, P.O.Box 252, 2501 Biel/Bienne, Switzerland