

Dear ICANN,

We are alarmed with the CPE Report on .kids. The report openly ignored the United Nations Convention on the Rights of the Child (UNCRC) and the definitions within the convention that describes the constituent stakeholder groups of the global children's rights and children's welfare community.

We would like to express our disappointment on several grounds:

1. **The report wrongly concluded that parents and children's rights organizations should not be considered parts of a cohesive global kids' community.** In accordance with the UNCRC, "*the child, by reason of his physical and mental immaturity, needs special safeguards and care, including appropriate legal protection.*" Kids do not exist independently in the community, but are supported and also represented by those who are no longer kids but are intricately involved with kids to protect, promote and advocate their rights for their best interests.

Together, kids (as defined by UNCRC that a "child" as a person below the age of 18, unless the relevant laws recognize an earlier age of majority), and children rights organizations, state institutions, parents and educators (as understood by the UNCRC and not simply a "collection of individuals and organizations), forms a coherent and well-established global children's rights and children's welfare community.

2. **The report wrongly concluded that there is no entity mainly dedicated to the global children's rights and children's welfare community.** The UNCRC is signed by all UN member nations on the planet, and is the universal standard that represents and protects the rights of all kids around the world. The United Nations Committee on the Rights of the Child (CRC), which is the UN committee commissioned to oversee the implementation of UNCRC, is a recognized entity for the entire global community in its breadth and depth.
3. **The lack of transparency of the composition and expertise on children's rights community of the evaluation committee.** We do not have any information on the composition of the evaluation committee. Do the evaluation committee members have experience with children rights or have understanding of the UNCRC? As part of the global children's rights and children's welfare community, we view the community to include all stakeholder groups, including kids, charities/NGOs, parents and educators and educational institutions. The provided rationale from the CPE report appears to demonstrate that the evaluation committee has limited knowledge of the UNCRC and children's rights principles and concepts. ICANN must not act upon such report without properly consulting with experts within the community for which the .kids global namespace will have a direct impact on.

4. **Children represents a delineated community from the populace at-large and requires special protection.** The fact that there is a UNCRC independent from the Universal Declaration of Human Rights demonstrates clearly the delineation of the community and the need for special consideration for kids worldwide. Many of the articles in the UNCRC specifically points out the importance of having the right safeguards in place where it is most important for kids. There are reasons why schools and playgrounds in the physical world have special rules to support kids that are not the same in bars. On the Internet, namespaces such as “.kids” must not be equally run the same way “.sex” or “.shop” are operated, without any additional safeguard considerations to children.

As part of the children’s rights and children’s welfare community, we have first-hand understanding of the unique social needs of children and the onus of society as a whole to safeguard these unalienable rights.

Children are undeniably impacted by policy decisions resulting from processes in which they cannot participate. It is precisely here that society needs to step in to advocate on behalf of the children’s best interests, to give voice to their perspective and needs. It is no surprise that the UNCRC is the most ratified international instrument – the world recognizes that children are a global community that is vulnerable to exploitation and has collectively put forth a set of guiding principles that comprehensively articulate the rights of the child.

ICANN is in a unique position to do the right thing. It is reprehensible to allow .kids to free fall into commercialized branding that openly disregards the fundamental rights enshrined in the UNCRC. It is irresponsible to allow .kids to be dictated solely by market-driven forces. The costs to society of failing its children are far-reaching. Consequences of inaction, impact of what is not done when failure is preventable, are quantifiable.

We look forward to a children friendly Internet. We believe in safeguards and prevention, not remedies when issues happen to children since it would affect their entire life.

Thank you!

Yours Sincerely,

SAPA Indonesia

Organization for the rights of Women and Children in Indonesia