

Staff Report of Public Comment Proceeding

Competition, Consumer Trust, and Consumer Choice Review Team (CCT) Final Report & Recommendations

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Prepared By: ICANN organization

Public Comment Proceeding	
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Important Information Links
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Section I: General Overview and Next Steps

The Competition, Consumer Trust, and Consumer Choice (CCT) Review Team was formed in January 2016 to assess the New Generic Top-Level Domain (New gTLD) Program in three areas: competition, consumer trust, and consumer choice. Launched under the [Affirmation of Commitments](#) (AoC), and now required by [Section 4.6](#) of the ICANN Bylaws, the review also assesses safeguards put in place to mitigate issues arising from both the introduction of new gTLDs, and the New gTLD Program's application and evaluation process, and examines to what degree the process of implementing the New gTLD Program was successful in producing desired results and achieving the stated objectives.

On 8 September 2018, the CCT Review Team submitted its [Final Report](#) and [Recommendations](#) to the ICANN Board of Directors for consideration.

In accordance with the Bylaws, the Board has six months from the date of the receipt of the final report to take action on the final [recommendations](#). Its decision must be informed by community input as stated in the Bylaws.

The public comment proceeding was released on 8 October 2018. Its initial close date of 29 November was extended to 11 December to address community requests for additional time to submit input.

Section II: Contributors

At the time this report was prepared, a total of nine (9) community submissions had been posted to the forum. The contributors, both individuals and organizations/groups, are listed below in chronological order by posting date with initials noted. To the extent that quotations are used in the foregoing narrative (Section III), such citations will reference the contributor's initials.

Organizations and Groups:

Name	Submitted by	Initials
Business Constituency	Steve DelBianco	BC
International Trademark Association	Lori Schulman	INTA
Non-Commercial Stakeholders Group	Rafik Dammak	NCSG
Governmental Advisory Committee	Fabien Betremieux	GAC
National Association of Boards of Pharmacy	Gertrude "Gg" Levine	NABP
gTLD Registries Stakeholder Group	Samantha Demetriou	RySG
Intellectual Property Constituency	Brian Winterfeldt	IPC
At-Large Advisory Committee	ICANN Policy Staff	ALAC

Individuals:

Name	Affiliation (if provided)	Initials
John Poole		JP

Section III: Summary of Comments

General Disclaimer: This section intends to summarize broadly and comprehensively the comments submitted to this public comment proceeding but does not address every specific position stated by each contributor. The preparer recommends that readers interested in specific aspects of any of the summarized comments, or the full context of others, refer directly to the specific contributions at the link referenced above (View Comments Submitted).

The public comment proceeding yielded a total of nine (9) submissions, including contributions from two (2) SO/ACs (GAC, ALAC), four (4) comments from GNSO Constituencies and Stakeholder Groups (BC, NCSG, RySG, IPC), two (2) trade associations (INTA, NBAP), and one (1) individual (JP).

All responders had also submitted comments on the [Draft report](#) (released in March 2017) and/or on [New Sections to the Draft Report](#) (published in November 2017) public comment proceedings. Five (5) responders make a reference to their prior input (BC, JP, INTA, NCSG, RySG).

This section compiles comments from each of the nine (9) commenters, organized by submission, and includes direct extracts and, in some instance, abbreviated content from the full comments. Section IV contains the analysis of comments.

BC:

- Welcomes the close attention the working group paid to domain abuse and the effectiveness of safeguards, as well as on participation and competition within the Global South
- Pleased to see additional recommendations the BC supported in its January 2018 comments on the New Sections to Draft Report are reflected in Final Report
- Generally supports the suite of recommendations put forward by the working group
- On access to data on consumer choice, competition, and consumer trust:
 - Shares concern that the ability to comprehensively assess the Program's impact on these key areas was limited both by the Program's relative newness, as well as the paucity of data available for some relevant metrics.
 - Supports the recommendations put forward to formalize data collection processes and to broaden data collection in future iterations of the CCT review, as well as in complementary policy development working groups and reviews.
 - Encourages ICANN to take advantage of data collection processes available within ICANN contracts with registries and registrars; to improve ICANN compliance data; and make use of voluntary data that can be obtained from contracted parties, the community, and users and registrants at large.
 - Believes the working group has struck the right balance by not drawing hasty conclusions on limited data while encouraging improved data collection in the longer term.
- On referral of key topics related to Rights Protection Mechanisms and New gTLD Application procedures to the respective policy development working groups:
 - Agrees with the working group's assessment that several topics require fuller assessment in order to fully grasp the impact of the new gTLD program on the domain name marketplace. Topics such as improving safeguards for TLDs in highly-regulated industries and effectuating voluntary commitments by new gTLD are important topics for the New gTLD Subsequent Procedures Working Group, while further assessment of the Uniform Rapid Suspension Procedure and the Trademark Clearinghouse belong within the remit of the RPM review.

- Keen to see further work within the New gTLD Subsequent Procedures Working Group on the use of incentives as a way to encourage registries and registrars to adopt policies and procedures that reduce abuse and improve trust for all users, and on expanding the impact of the Program in the Global South.
- Believes further work in both of these areas are essential to ensure that future application processes evoke trust in users, and that the competitive benefits associated with such programs are global. Research presented last year in ICANN's "LAC DNS Marketplace Study" shows how the region is exposed to a great deal of vulnerability in the domain name space, which can be understood to extend to other developing world countries as well. More progress on the evaluation of Uniform Rapid Suspension Procedure implementation has previously been requested as a way to help curb and expedite the resolution of issues and continues to be an important matter in furthering business-oriented goals in underserved regions.
- On DNS Abuse and Safeguards
 - Supports the continued exploration of the impact of abuse and safeguards to curb abuse on the new gTLD program including through contractual negotiations with registries and registrars, improved public reporting through DAAR or other initiatives, enhanced user education, and the use of incentives, as described above.
 - Particularly supports the proposed approach to address contracted parties whose rates of abuse are found to dramatically exceed the normal range. Contracted parties whose abuse rates were sufficiently high to suggest that they were complicit in the abuse being carried out could “should in the first instance be required to a) explain to ICANN Compliance why this is, b) commit to clean up that abuse within a certain time period, and / or adopt stricter registration policies within a certain time period.” The CCT’s proposal to set specific thresholds to identify abusive TLDs and launch inquiries should allow ICANN Compliance to take meaningful action against registry operators that are unwilling or unable to address abuse within their TLD.
- On ICANN Negotiations with Registries and Registrars
 - A number of the recommendations suggest changes to contracts with registries or registrars. While generally supportive of the objectives of those recommendations, emphasizes community input and transparency in ICANN Org actions.
 - Prior to ICANN entering any structured negotiations with registries or registrars (including bilateral negotiations), there should be agreement between the community and ICANN Org on objectives. It is vital that ICANN operate in an open and transparent manner and involve the multistakeholder community, particularly when contracted parties are involved.

JP:

- Believes the CCT Review failed to appropriately consider and evaluate the important and fundamental reasons why ICANN's new gTLDs program is a failure in the areas of competition, consumer trust, and consumer choice (noting that “registrants” are included within the definition of “consumer” as used by the CCT Review Team).
- Refers to May 2017 comments to the CCT Draft Report as well as input provided on the New gTLD Subsequent Procedures PDP WG initial report and on Draft Final Report of the Second Security and Stability Advisory Committee Review (SSAC2).
- Believes the review team failed to ask why ICANN rejected advice from the U.S. Department of Justice Antitrust Division and that little has changed since the introduction of new gTLDs because most new gTLDs are not trustworthy and are an inferior alternative to .COM domain names due to pricing issues, as well as universal acceptance (UA) issues and collision issues. The draft report fails to even mention either the UA or collision issues.
- Believes the New gTLD Program history is incomplete, fails to accurately reflect the historical record and context, fails to note the numerous conflicts of interest and controversies surrounding the development of the ICANN new gTLDs program
- Believes Competition in the DNS Marketplace section fails to properly define, much less understand the global domain names marketplace

- Believes Consumer Choice fails to understand there was little need for such a massive expansion of gTLDs--the global domain names market was already healthy, competitive and vibrant with over 200 ccTLDs plus existing generic TLDs.
- Considers that the review team fails to understand components of “consumer trust”—the necessity of regulation of monopolies, and the necessity of having complete wholesale and retail pricing transparency in order to have a healthy and competitive market.
- Believes that Public Interest Commitments section fails to note and discuss the complete utter failure in consumer (registrant) protection, including protection from price-gouging, ample notice of price increases, etc. Right Protection Mechanisms—fails to address the failure of ICANN to provide a means and method for trademark holders to block new TLDs violative of distinctive registered marks. ICANN should not be utilizing extortionate methods to “sell” defensive new gTLDs.
- Believes that Application and Evaluation section fails to address the already recognized aspects of new gTLDs’ mistakes in implementation.
- Suggests that recommendations 1-16 should all be Prerequisite or Priority Level and all wholesale and retail pricing data should not be confidential but required to be open, disclosed, published, and transparent, in order to have healthy market competition. Opaqueness and “confidentiality” are not consistent with healthy competitive markets, consumer choice, and consumer protection.

INTA:

- Observes that the data required to support the responsible launching of a subsequent round, including necessary adjustments of application and operational rules, does not yet exist.
- Refers to May 2017 comments on the CCT Draft Report and January 2018 input on CCT New Sections of the draft report.
- Notes that INTA knows, both from its own survey of trademark owners that new gTLDs have imposed substantial defensive costs upon the brand community without providing adequate offsetting benefits – and that its members have been victimized by trademark infringement and associated domain abuse.
- References INTA’s advice on new RPMs created for the program and notes the jury is still out on whether these defects in the new gTLD RPMs will be adequately addressed by the RPMs Review.
- Believes no subsequent round of unrestricted new gTLDs should be launched until:
 - more data is collected and analyzed regarding the impact upon trademark owners and upon overall domain name system (DNS) competition resulting from the first round;
 - ICANN’s Review of all Rights Protection Mechanisms in all gTLDs PDP Working Group (“the RPMs Review”) completes and the Board approves its Phase I analysis of the effectiveness of the RPMs created as part of the new gTLD program;
 - any strengthening of RPMs recommended in Phase I of the RPMs Review has been considered and adopted by the GNSO Council and ICANN Board and is on track to be implemented.
- Suggests the introduction of the European Union’s General Data Protection Regulation (GDPR), ICANN’s adoption of the Temporary Specification for gTLD Registration Data, and the subsequent changes in the publicly available WHOIS data have substantially reduced the effectiveness of the WHOIS system and the RPMs. These changes and the difficulty or inability of obtaining domain name registrant information are making it difficult for law enforcement and affected owners of trademarks and other forms of intellectual property to effectively identify and combat illegal and infringing activities that threaten the safety and trust of internet users. INTA therefore strongly urges the ICANN Board, in considering the Final Report as a prerequisite for any subsequent round of domain registries, to also require that a Uniform Access Model for domain name registrant information be in place before approving such rounds.
- Believes no subsequent round should be planned or launched until all program changes and safeguards recommended by the CCTRT have been fully implemented.
- Notes that unlike new gTLDs available to the global public, .BRAND gTLDs are under the sole control of a single brand owner for its own benefit and the benefit and use of its distributors,

dealers, authorized representatives, staff and consumers. A June 2018 report released by Corporation Services Company (CSC), "CSC Dot Brand Insights Report", documents the growing utilization of .brand gTLDs that, by their very nature, virtually eliminate trademark infringement concerns while minimizing the possibility of DNS abuse activities. Consideration should be given to a subsequent round consisting primarily of .BRAND gTLDs, which by their nature do not pose substantial trademark infringement or domain abuse risks, along with other gTLD types comprising lower risk categories such as community gTLDs.

- While INTA believes that additional data and improvement of RPMs must precede any subsequent round of new gTLDs available to the general public, the restricted availability of .BRAND domains and the generally higher level of security measures they adopt means that they do not pose the same risk to brand owners or consumers. Unlike more open, unrestricted TLDs, in the case of a .BRAND, the registry operator will be either directly responsible for activity at the second level (itself or through its group companies) or indirectly responsible, if it permits second level domains to be used by its trademark licensees. Even in this latter scenario, the reputation of the .BRAND registry operator would be impacted by any abuse or infringing activity occurring through a second level name and thus there is a strong incentive for the .BRAND registry operator to act swiftly in the face of such unwelcome activity. Therefore, INTA believes that ICANN should consider restricting any near-term new gTLD application window to .BRANDS and other categories that pose lower risk, such as community gTLDs.
- Supports the possibility of a Domain Name System Abuse Dispute Resolution Policy (DADRP).
- Notes implementation of effective means to deter or, if necessary, substantially reduce trademark infringement are directly tied to the maintenance of a secure Internet, particularly for online commerce, and thus supports recommendation 15. At a minimum, such new safeguards and associated remedies should be developed and made applicable to any subsequent round of new gTLDs with domains made available to the general public.

Concludes that extreme caution in the initiation of any subsequent round, and additional data gathering accompanied by strengthened safeguards, are required to assure adequate protection of not just brand holders but the global public they serve daily.

NCSG:

- Refers to May 2017 comments on the CCT Draft Report, January 2018 input on CCT New Sections of the draft report, and October 2017 statement on the SADAG report, and highlights that a number of its comments provided on the initial report are still valid.
- Has three concerns: 1) the enormous and largely unwarranted data gathering recommendations that are presented with the report; 2) the fear that many recommendations push ICANN far beyond its limited scope and into the content-regulation arena; 3) the frustration that many Consumer Choice recommendations disproportionately favor one stakeholder, specifically the Intellectual Property Constituency, at the expense of the other Stakeholder Groups and Constituencies.
- Questions the "prerequisite" status of recommendations 9, 11, and 12 and fails to see any logical or empirical justification for holding up market entry based on those recommendations. Find the report's proposal to further delay additional market entry until systemic, costly, and potentially intrusive changes are made to data collection procedures to be unwarranted.
- On issues associated with Data gathering:
 - On recommendation 5 - sees no convincing explanation for how or why this should affect future rounds. Is the CCT-RT asserting that it needs to regulate the supply of new gTLDs based on secondary market price movements? The NCSG sees no reason for this unless ICANN thinks of itself as a cartel manager that needs to regulate supply in order to maintain the profits of incumbents at a certain level. Aside from this, the secondary market consists of private transactions amongst domain registrants and such data will be inherently difficult to collect unless intrusive regulatory requirements are placed on all registrants.
 - On recommendation 9 - the NCSG does not understand the justification. Page 70 of the report already contains a perfectly adequate factual and quantitative analysis of the defensive registration problem. It shows that the cost, "for most trademark holders related

to defensive registrations appears to be lower than some had feared prior to the inception of the program.” The report also describes the blocking services maintained by many new TLDs and states that “we expect to obtain more information [about the use of new blocking services] prior to the publication of our final report.” There is no support in the data for halting new rounds. Nevertheless, following its longstanding habit of bending over backward for trademark interests while ignoring all other interests, the ICANN report goes on to say that “a small fraction of trademark holders are likely incurring significant costs.” The NCSG thinks that such costs are not really significant, otherwise; a survey or study is required to confirm that fact. In response, the NCSG notes that defensive registration across all gTLDs is not forced upon trademark holders by the mere existence of new gTLDs. The UDRP and other RPMs already (over)protect trademark holders from actual misuse of domains. Widespread defensive registration is a pre-emptive choice that certain large and wealthy trademark holders have made on their own. The NCSG firmly rejects the idea that the entire domain name market needs to think of ways to lower the costs of this tiny special interest group before any new market entry is allowed.

- On recommendation 11 - considers it to be another inexplicable call for ICANN to perform market research about what gTLDs are visited. Even if this data would be useful, NCSG sees less reason to hold up all new gTLDs applications until this kind of research is performed.
 - On recommendation 12 - believes that the first two parts of the recommendation border on violating ICANN’s mission and core values, as it starts pushing the organization over the line of domain name coordination and into content regulation, and considers there are already sufficient legal and policy safeguards in place against misleading or fraudulent domains or privacy, such as data protection and data breach notification laws. The NCSG has always rejected the idea that ICANN should become an all-purpose regulator of the Internet; it can and should leave most consumer protection, competition policy, and content regulation problems to other more specialized agencies, and focus on its primary mission of coordinating the DNS.
 - Some of these prerequisite implications seem to imply that ICANN wants to set itself up as a central planner who will decide on the market which new gTLDs are needed and which are not. Does not believe that this is ICANN’s proper role. ICANN should provide a stable coordination and regulatory platform for suppliers and consumers and should not try to pick winners and losers. Nor should ICANN try to dictate the kind of content that gTLD registries provide unless the registry makes specific contractual commitments as part of its registry agreement. In sum, NCSG rejects the “prerequisite” status of all of the recommendations in 9, 11, and 12 and warns about the substance of recommendations 5, 6 and 8.
- On issues outside of the scope of ICANN’s mission:
 - On recommendation 13 – should be modified to be a question solely about whether registration restrictions are enforced by registries and registrars. To dig deeper into the term of “DNS abuse” – undefined in this question – could bring ICANN into an evaluation of copyright, trademark, hate speech, photographs of women without veils, and many other speeches and content-oriented material. The purpose of the question is whether the restrictions are enforced; limiting the recommendation to that should be fine.
 - On recommendation 14 –The NCSG does not support this recommendation and strongly calls for its rejection. It is beyond dispute that ICANN has the narrow and intentionally limited technical scope and mission “to ensure the stable and secure operation of the Internet’s unique identifier systems.” (Bylaws Article 1, Section 1.1.) It is emblazoned in our new bylaws and extraordinarily clear in our post-transition mission that we absolutely will not -- as an ICANN Community, ICANN Board of Directors and/or ICANN Staff -- do what this recommendation demands and seeks. Must not direct ICANN org to negotiate anti-abuse measures with new registries as such acts will bring ICANN directly into the heart of the very content issues we are mandated to avoid. Providing guidance, negotiation and worse yet, financial incentives to ICANN-contracted registries for anti-abuse measures are

completely outside of our competence, goals, and mandates. Such acts would make ICANN the policeman of the Internet, not the guardian of the infrastructure. A role beyond our technical expertise; and a recommendation we must not accept.

- On recommendation 15 – Opposed to this recommendation. While understands the desire to integrate a new service, NCSG is not certain why:
 - ICANN does not have the power to act under its existing contracts and accreditation, and
 - Whether we should be formally instituting a new, required Dispute Resolution Policy that relies for its primary input and trigger on private, non-transparent services that both registrars and registrants have alleged to be unfair.

NCSG is also reluctant to engage the ICANN Community, with its increasingly overburdened volunteers, into the difficult, lengthy and time-consuming process of defining another (unneeded) Dispute Resolution Policy. These take enormous amounts of time and complicate its implementation.

- On recommendations 17 and 18 – believes these are beyond the scope of this Review Team. The Whois 2 Review Team is currently finalizing its work; the GNSO Next Generation Registration Directory Service PDP Working Group has been terminated after more than two long years of discussions that led nowhere, and the Expedited Policy Development Process team is already working hard to review and revise the Temporary Specification. Adding another call for a review and study is an undue burden on the ICANN Community. Urges that this recommendation be dropped
- Recommendation 19: The word “abuse” seems to be a systemic response to security threats. If so, no objection, but this needs to be clarified.
- Recommendation 20: The term “abuse” appears to be used differently than in the prior recommendation. This “abuse” runs to content, speech, and expression – “the volume of reports of illegal conduct in connection with the use of the TLD that registries receive from governmental and quasi-governmental agencies ... and from the public.” Certainly, registries should be working with law enforcement within their jurisdiction, and law enforcement should be working, as appropriate, across jurisdictions. But this recommendation puts ICANN squarely in the “content seat” as a monitor of content and speech. China seeking registries to take down pro-democracy websites as a violation of their criminal laws is not a complaint area for ICANN to enter. The same limits apply to complaints about websites involving hate speech laws which European governments may want to take down and the United States may expressly protect. ICANN is a technical policy organization; that is its expertise and the limits thereof. This recommendation highlights a perfect place for national governments to be involved, and international cooperation to be fostered. But for ICANN, this is an “abuse” recommendation outside the scope of ICANN and must therefore be deleted. In general, the question “What is abuse?” should be clarified.
- Recommendation 21: Detailed information on the subject matter of complaints shouldn't go beyond ICANN limited scope and mission.
- Recommendation 22: The question of what the Review Team seeks is key. Is the Review Team urging ICANN to investigate data and information gathered on individual websites? If so, how does this recommendation fall within the scope and mission of ICANN which expressly is not involved in online content? If so, strongly recommend deletion. If not, how can this be clarified to remove doubt?
- Recommendation 24: This recommendation is beyond the scope and mission, limits, and competence of ICANN and the ICANN community. It must be deleted or modified to the scope and mission of ICANN. It deals with “cyberbullying” and NCSG is afraid that it pushes again ICANN into content regulation area.
- On issues with favoring more the Intellectual Property Interests:
 - Believes some recommendations seem biased and do not take into account the interests of the whole community.

- Recommendation 26 calls on ICANN to conduct, and regularly repeat, a “full impact study to ascertain the impact of the New gTLD Program on the cost and effort required to protect trademarks in the DNS - not once by regularly.” If, as the Review Team reports, “Early indications are that the new rights protection mechanisms have succeeded in minimizing the level of defensive registration” and “preliminary indications are that increases in defensive investment by trademark holders have been less than feared by some prior to the launch of the program,” how is this recommendation justified? Given the extensive work of the NCSG on the balance of trademark rights and fair use protections, free expression and legitimate parody, criticism and the rights of all to use basic dictionary words, geographic places, and common names, how is such a limited study in favor of one interest even fair? If this Recommendation remains, NCSG asks that ICANN also conduct, and regularly repeat, a full impact study on trademark owners’ abuse of rights protection mechanisms in ICANN policies to restrict free expression rights, and another full impact study to quantify the costs of these measures on domain name suppliers and consumers. Echoes response and concerns to Recommendation 9 above.
- Recommendation 28 must be deleted. Suggest that such work and associated decisions be dealt with separately by the RPM WG.

GAC

- Considers several topics, findings and recommendations in the CCT final report as having a vital role in the public policy responsibilities of ICANN.
- Endorses recommendations in the final report that encourage the collection of data to better inform policy making before increasing the number of new gTLDs. The increased collection of data, as suggested but not limited to Recommendations 1, 8, 11, 13, 17, and 18 should be amongst the more urgent priorities. Increased data collection on end user consumer trust, DNS abuse, domain wholesale and retail pricing, reseller information, 1 WHOIS accuracy, and other categories as identified in the report will allow for more informed decision and policy making within the ICANN community particularly with regard to future standard registry and registrar contract provisions and any subsequent rounds of gTLDs. ICANN’s Open Data Initiative is a welcome example of an effort to identify and share certain data with the community. When appropriate, this data should be collected and integrated with existing data efforts at ICANN, in particular the Domain Abuse Activity Reporting (DAAR) tool. Integration with DAAR would simultaneously support recommendation 16, that calls for increased transparency of the data on DNS abuse. In addition to collection of data, centralization of existing and new data should be a priority of ICANN, as mentioned in Recommendation 1. The use of expert personnel, such as a data scientist would be vital to centralizing data.
- It is appropriate to consider, and the GAC supports, more proactive measures to identify and combat DNS abuse, in line with ICANN’s commitment to the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS and the Internet. The report finds a clear role for ICANN to play in assisting the names community help fight DNS abuse. This should include incentives (contractually and/or financially) by ICANN to encourage contracted parties to adopt proactive anti-abuse measures. An environment that further encourages contracted parties to proactively combat abuse, as opposed to waiting for complaints or actions by ICANN compliance, would benefit all users and could help ease the burden on public safety organizations. Consequently, the GAC supports Recommendation 14 for proactive anti-abuse measures. Furthermore, the GAC would also support Recommendation 15 which contemplates changes to ICANN’s standard contracts with registries and registrars.
- On recommendation 10 - Creating privacy baselines for all contracted parties, would be beneficial in clarifying what ICANN’s expectations are with regards to the sharing of personal information held by these parties, beyond WHOIS data. While it is likely premature to issue such guidance or create a policy development process (PDP) to address this issue (given ongoing GDPR and data privacy related efforts such as the expedited PDP on WHOIS), identifying reasonable privacy expectations (with due consideration to local laws) would be a worthwhile project, upon conclusion

of the EPDP or when further clarity is available on WHOIS compliance with relevant Data Protection legislation.

- Supports the CCT Review Team’s recommendations 12 and 23 which focus, inter alia, on creating incentives and eliminating disincentives to registries meeting user expectations about who can register gTLDs in sensitive or regulated industries and gathering data about complaints and rates of abuse in these gTLDs that often convey an implied level of trust to the public because of their names (e.g. .charity, .bank, .accountant). The GAC provided detailed advice on safeguards for sensitive, regulated and highly regulated gTLDs in its Beijing Communique and reiterated this advice in several subsequent Communiques. Consistent with GAC advice, the GAC particularly endorses Recommendation 23, which recommends an “audit to assess whether restrictions regarding possessing necessary credentials” in highly regulated gTLDs are being enforced.
- Support Recommendations 20 and 21 addressing improvements that can be made by ICANN Contractual Compliance. Specifically, the report makes reference to the GAC Beijing and Singapore Communiques where the GAC advised the ICANN Board on safeguards to be implemented in New gTLDs regarding the handling by registry operators and ICANN of complaints from government agencies and the public. By implementing recommendations 20 and 21, ICANN’s contract compliance function would have a better understanding on whether the implementation of these safeguards is effective or needs reform. It would also be in line with other recommendations that call for transparency of data, if ICANN Contractual Compliance can publish more details as to the nature of the complaints they are receiving and what safeguards they are aligned with. Future policy making and contractual safeguards will be enhanced with the availability of this data.
- Believes that participation of Underserved Regions in ICANN processes and programs is a matter of Diversity (consistent with recommendations of the Accountability Cross-Community Working Group Work Stream 2 in this area) and should be linked to broader ICANN strategic goals and integrated as part of ICANN departments objectives.
- Supports recommendation 29 - establishment of “clear, measurable goals for the Global South, including whether or when applications and even number of delegated strings should be objectives” of any New gTLD Application Round.
- Supports recommendation 30 - expanding and improving outreach to these regions noting that such outreach does require a more comprehensive approach and better targeting, building on the challenges identified with past initiatives.
- GAC would support the proposed coordination by ICANN of a pro bono assistance program (Recommendation 31) and revisiting of the Applicant Financial Support Program so as to reduce the actual cost of participation (Recommendation 32). The latter program should consider the unique constraints that are specifically experienced in Underserved Regions, as outlined in previous comments.
- On recommendation 34 - Supports that a thorough review of procedures and objectives related Community-Based Applications be conducted prior to the launch of any future round of New gTLD Application.

NABP

- On recommendation 12 - supports this recommendation and maintains that registration restrictions are appropriate for gTLDs operating in sensitive or regulated sectors. This recommendation is in the best interest of consumers (end users), as it supports the creation of a trusted online environment that is user-friendly and free of bad actors and domain name system abuses. Still, registration restrictions add complexity and cost to business operations. While this is a burden that the registry operator voluntarily takes on, it is reasonable to request a reduction in the ICANN registry fee to account for these higher costs, given the safety and security these TLDs provide for registrants and internet users.
- On recommendation 13 - NABP supports this recommendation and believes this data is important to capture, provided any such activity would be voluntary. Having experience operating a registry with restrictions on who can buy and maintain domains within the TLD, NABP believes that the study described in this recommendation would provide valuable insight to the internet community. As an example of the type of information that may be gleaned from such a study, verified TLDs

.pharmacy, .bank, and .insurance have restrictions in place regarding who can register a domain within those TLDs, and none of them have had any instances of abuse in the lifetime of the registry. NABP understands the costs and benefits of operating a verified TLD, as well as enforcing registry requirements. Data derived from such a study would be useful in considering future policy decisions relating to whether restrictions should be encouraged in new gTLDs or included in new gTLD contracts for those gTLDs operating in highly regulated sectors.

- On recommendation 14 - NABP supports this recommendation and encourages the promotion of activities to prevent and mitigate DNS abuse. While any mandatory amendments to existing Registry Agreements would give rise to logistical and diplomatic challenges, incorporating such provisions in subsequent rounds of new gTLDs seems reasonable and desirable. For both existing and new gTLDs, incentives, including financial incentives, for registries to adopt proactive anti-abuse measures would be a positive step forward in building consumer trust and protecting the integrity of the domain name system.
- On recommendation 15 - NABP supports this recommendation and agrees that ICANN should establish thresholds of abuse at which compliance inquiries are automatically triggered. While mandatory amendments to existing Registry Agreements would give rise to logistical and diplomatic challenges, some kind of formal commitment to discourage such abuses must be implemented. Systemic use of specific registrars or registries for DNS security abuse is a problem that threatens the integrity of the DNS. It is appropriate for the ICANN Board to prioritize and support community work in this area to enhance safeguards to protect end users and thereby build trust in the internet.
- On recommendation 16 - NABP supports this recommendation. This information should be collected and published on an ongoing basis. Registries and registrars connected to high levels of DNS Security Abuse should be required to implement anti-abuse measures. It is appropriate for ICANN to devise a plan of action in response to information derived from such studies.
- On recommendation 22 - NABP supports this recommendation. It is appropriate for registries to implement security measures commensurate with the offering of services that involve gathering sensitive health and financial information. As a registry operator that has implemented such practices, NABP would be interested in engaging with ICANN and other relevant stakeholders to share information regarding this safeguard.
- On recommendation 23 - NABP believes this data is important to capture, provided any such activity would be voluntary. Having experience operating a registry with restrictions on who can buy and maintain domains within the TLD, NABP believes that the study described in this recommendation would provide valuable insight to the internet community. As an example of the type of information that may be gleaned from such a study, verified TLDs .pharmacy, .bank, and .insurance have restrictions in place regarding who can register a domain within those TLDs, and none of them have had any instances of abuse in the lifetime of the registry. NABP also understands the costs and benefits of operating a verified TLD, as well as enforcing registry requirements. Data derived from such a study would be useful in considering future policy decisions relating to whether restrictions should be encouraged in new gTLDs or included in new gTLD contracts for those gTLDs operating in highly regulated sectors. In addition, existing gTLDs that have voluntarily included verification and validation requirements could provide useful insight on the costs and benefits of implementing registration restrictions. NABP understands the costs and benefits of operating a verified TLD and may be resources for gathering this data. NABP agrees with the CCTRT that this information would help to inform policy decisions regarding contracts with new gTLDs. In regard to setting policy for new gTLDs, NABP believes subsequent procedures for new gTLDs should require a registry to operate as a verified TLD if it: 1. is linked to regulated or professional sectors; 2. is likely to invoke a level of implied trust from consumers; or 3. has implications for consumer safety and wellbeing.
- On recommendation 25, NABP supports this recommendation. Voluntary commitments, if permitted in subsequent rounds, should include their intended goal and be submitted during the application process, allowing an opportunity for the community to review and, potentially, object. Such commitments should be accessible in an organized, searchable format.

RySG

- Has deep concerns with Final Report. Most of its recommendations are overbroad, unsupported by data, or fiscally irresponsible, and many violate the terms of contracts with ICANN.
- Highlights its May 2017 input on the CCT Draft Report and January 2018 input on the New Sections to the Draft Report and comments that the review appears to either not have considered or disregarded comments without a rationale.
- Urges the Board 1) not to adopt the Recommendations wholesale; 2) to critically review the Recommendations in light of RySG comments and adopt only the ones that are fully within ICANN's remit and are likely to provide significant, meaningful data that will yield measurable results. Some of the Recommendations may need to be altered by the Board before they can be adopted. Some should not be approved at all; 3) to read the public comments in full.
- Considers ICANN must manage to its budget. Recommendations that are unworkable and overbroad will waste the community's resources and the Final Report has not identified how it will fix the gaps identified in the previous public comments. Significantly, all of the Recommendations have the following theme: they aim to restrict what registry operators can do until we are all following the same model. In addition to limiting meaningful competition and suppressing innovation, the Final Report further intends to hold registry operators accountable for all downstream uses of services while micromanaging pricing.
- Believes report violates Registry Contracts: Final Report recommends that ICANN compel registry operators to negotiate both incentives, and penalties, for proactively monitoring for abuse as well as specific user protections for a registrant's customers. The Bylaws prohibit regulating content, and abuses not already covered by registry agreements are generally content-based abuses, such as cyberbullying, or business-based abuses, such as a website operator's mishandling of their own customer data. The Final Report further suggests ICANN Compliance should be used to gather data from registries that is not required under contracts.
- The Final Report adopts the narrow thinking that if a business practice is good for some registry models, it should be applied to all registries. This one-size-fits-all approach is precisely what many new gTLD applicants were trying to avoid because it stifles creativity and innovation. Several recommendations call for data in order to determine if some registry business decisions (like price, customer terms, or registration eligibility restrictions) should be applied to all registry operators, regardless of business model. RySG urges the Board to protect the innovations both new and legacy TLD operators, and registrar partners, are trying to bring to the DNS rather than assuming the industry is static. Forcing us all into one model will prevent the next "big thing".
- The same narrow thinking causes the Final Report to imply that price is the key to evaluating competition and choice. Registry operators offer consumers choice on more than just price. Yet the only Recommendations about competition turn on how much money everyone in the supply chain is selling domains for, assuming that lower prices are the only measure of competition. Similarly, Recommendation 27 requests that the RPMs PDP evaluate four suggestions to change the URS without identifying what problems prompted the recommendations and how the Final Report determined that those four recommendations were the solution to the problem.
- Fiscal Responsibility Throughout the report, the CCT-RT recommends data-gathering projects, surveys, and studies assuming that anywhere they don't have data is a problem. The RySG urges the Board to balance the perceived benefit of expensive and time-consuming data gathering exercises against the anticipated cost and synthesis of all the data. Some recommended studies, while potentially yielding fascinating information, are highly unlikely to have any significant outcome that will influence the next round of applications.
- No one wants them to be viable and succeed more than RySG. RySG agrees that a periodic review of the state of the system through a CCT-RT is a good thing, but RySG has deep concerns that many of the Recommendations would be irresponsible for ICANN to adopt as written. RySG asks the Board to tailor its response to this report to ensure that the projects that flow out from out from it are measured, cost-effective, realistic, and within ICANN's remit.
- Recommendation 1 lacks specificity needed for the Board to act. This, according to the RT's rationale, is an extremely wide-ranging recommendation—it advocates for data collection

regarding multiple market sectors, the impact of safeguards, compliance information, and other material. While RySG is in favor of reasonable levels of market intelligence that can more precisely inform policymaking (corollary: RySG supports data-based reports on the outcomes of policy implementation), there are 23 pages of rationale supporting this recommendation. The community would be well served to carefully review this practically open-ended request and consider each category judiciously. In fact, it may be wise to separate the categories detailed in the rationale into separate recommendations in order to better address each.

- On recommendation 2 The rationale provided does not indicate any valid basis for requesting registry wholesale pricing. The recommendation appears to infer that lower legacy prices might indicate more competition, but this is an unsupported hypothesis and this recommendation comes off as a “fishing expedition” for sensitive data. Furthermore, the CCT-RT suggests that ICANN should compel legacy TLD operators to the table to negotiate a contract amendment in order to forcibly obtain information to which ICANN and the community are not otherwise entitled. In its current form, this recommendation is not supportable: · Price information generally is business sensitive. · “Strong assurances” is ill defined and, should this recommendation be considered, would need to be presented in detail to registries and registrars, with their extensive input on handling of data. · “Confidential basis” does not specify who would have access to data. · “Analytic purposes” also would need to be much more clearly defined, and a statement of eventual outcome elucidated. · Non-disclosure agreements are helpful, but it isn’t clear who would arbitrate access to the data, and to what extent.
- On recommendation 3, For many of the reasons cited in the reply to recommendation 2, this recommendation cannot be supported. “Analytic purposes” does not remotely suggest a well - considered benefit to ICANN, registries or the community, particularly given ICANN’s lack of remit over pricing. This recommendation for “transactional data” for “individual domain transactions” does not match the Detail section which again asks for wholesale pricing. The definition of success is overbroad and not narrowly tailored to achieve a defined purpose. This entire section is worded in the passive voice. Who shall gather this data, and from whom? Will ICANN spend millions to track down end users and compel them to disclose what they paid? A significant portion of domain names sold are not even sold by contracted parties but are sold by resellers or in private sales and auctions.
- On recommendation 4, Registries don’t purport to speak for registrars; however, RySG is confident they share a concern that not only should ICANN not involve itself with pricing studies, using parties’ contracts with ICANN as a mechanism to force its production is terribly inappropriate. Contracts are not levers for mandatory revelation of sensitive data. the RySG notes that the CCT-RT’s narrow focus on price as the chief indicator of competition is short-sighted and misses many other ways registries and registrars compete. By focusing on price alone, you’re missing the value of the domain name ecosystem.
- Recommendation 5 - The RySG repeats its concern over any ICANN interest in pricing. The secondary market is once removed from the primary market and is even further outside ICANN’s remit. In addition, except for publicly reported transactions, it likely would be very difficult to convince parties to private transactions to divulge sales prices. What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?
- Recommendation 6 - Before any work of this nature is undertaken, it is essential that a statement of benefit is clearly articulated and that the costs of undertaking the work are well defined and measured against the statement of benefit The RySG is concerned that such an undertaking may be expensive in terms of financial and/or other ICANN resources and that resource allocation in this area may impact on critical policy or other ICANN priorities. ICANN serving as a coordinator of research, standardizing methodology, and directing resources toward organizations already involved in such research may be practical and beneficial. However, without a clear statement of benefit, method and cost, it is not sufficiently well justified (making it unclear why this is labelled as prerequisite). Question: What is the perceived benefit of this recommendation, what would the method and cost be to undertake it, and would the benefit exceed the cost?

- On recommendation 7 - The RySG obviously is in favor of increasing usage. However, while this data could be useful, it is unclear how, in the end, it would be put to use by the ICANN organization or the community. The various studies that the CCT-RT undertook to measure the impact of parking on both competition and rates of DNS abuse returned inconclusive results. The new sections of the report put forth a number of possible hypotheses that could be explored, but which have no demonstrable, concrete bases. Given the absence of a documented problem, the RySG believes additional studies on parking are unnecessary at this time and are an ineffective use of ICANN's shrinking resources. To the extent ICANN adopts this recommendation and dedicates resources to study parking further, the RySG recommends that ICANN take a critical approach and scrutinize the utility and validity of those studies, without pre-supposing the outcomes of any studies.
- On recommendation 8 - What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost? Additionally, the RySG believes the proposed questions in Appendix H (not G) are too narrow, speculative, and leading to result in meaningful answers. The CCT-RT should clearly lay out the information it seeks to and then let a qualified survey provider determine which questions, including follow-up questions, will get at the data likely to provide that information. For example, Q1 might simply ask "what are switching costs" (keeping in mind that the CCT-RT itself notes slightly later in the survey that most businesses with a TLD on a legacy page don't simply "switch" to a new gTLD but likely use a slow phase-in and maintain dual sites for years, if not forever)?
- On recommendation 9, The RySG believes this data is at best elusive and more likely impossible to get, given the reluctance of corporations to provide such confidential business information. Furthermore, the wording "uneven distribution costs of defensive registrations to a small number of trademark holders" implies that the trademark holders themselves have no say on the size of their defensive registration budgets and portfolios, whereas in reality, some may simply be more risk-averse than others. Given the futility of this exercise, the RySG reiterates its 2017 comment and strongly objects to this work being a prerequisite for another round.
- On recommendation 10, The RySG notes that the expected outcome of the EPDP is a permanent data privacy/protection specification, including strict purposes for which registries and registrars may transfer or share data. To the extent that this recommendation applies to privacy outside of WHOIS/RDDS data, the RySG questions whether such policies or "baselines" fall within the picket fence and are an appropriate subject for a PDP.
- On recommendation 11, The RT's rationale states that the findings of such a study could help measure the extent of trust the public places in new gTLDs, and that such a study could provide useful information for future gTLD applicants. The RySG agrees. RySG does not agree, however, that this should be a prerequisite to future rounds. Application decisions are not necessarily based on such data. What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost? The RySG reiterates its 2017 comment, with the strong restatement that this study should not be a prerequisite to future rounds. This study can only 15/47 determine if a registry's business model was successful so far at building trust amongst the surveyed population - it cannot preemptively gauge how much trust a specific business model will have in the future (particularly unless the specific target market is surveyed) and will not impact future applications. Furthermore, statements like "This information could inform future policy-making on the terms and conditions that should apply for all new gTLD applicants" imply that the CCT-RT believes new gTLD applicants are one-size fits all, with the same target market and drivers. This erroneous perception is pervasive throughout this Final Report and is a fatal flaw in its value as a set of recommendations.
- On recommendation 12, The nature of incentives isn't stated and therefore cannot yet be considered for support. Further, RySG do not support (1) and (2) as requirements— this in effect could be a form of content restriction, something the community, appropriately, is foursquare opposed to. (The Nielsen study may not have provided granularity to assess, for example, the possibility of a carpet cleaning service using the term Rug.Doctor, a perfectly legitimate use of the gTLD.) Creativity, without violating law, is a long-held hallmark of Internet naming and content and should not attempt to be curtailed. RySG recommends the removal of (1) and (2). The RySG

supports (3). As a prerequisite, what is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost? The RySG reiterates its 2017 comments. While the RySG recognizes the potential value of additional research on the benefits of registration restrictions, it strongly cautions the CCT-RT and the Board against using that sort of study to regulate business plans and content through forcing one model on all registry operators or otherwise inappropriately influencing competition within the domain name industry by incentivizing certain gTLD models and disadvantaging others. Members of the RySG who operate or represent the operators of Verified TLDs maintain that registration restrictions are appropriate for gTLDs that operate in sensitive or regulated sectors. Registration restrictions add complexity and cost to business operations. While this is a burden the Registry Operator has voluntarily taken on, this comment should not be taken as a statement that individual operators of verified or restricted gTLDs should not be able to individually request reductions in their ICANN registry fees to account for those higher costs.

- On recommendation 13, See comments to Recommendation 12. RySG additionally notes that the RySG remains firmly opposed to using the Compliance audit function (which is designed to assess compliance with contracts) to gain confidential business information. If ICANN desires this information, it can obtain it through independent research or through requests for voluntary information.
- On recommendation 14, The RySG supports recognizing and supporting the many ROs that take steps to discourage abuse, but opposes amending the RA as recommended, to mandate or incentivize ‘proactive’ anti-abuse measures. This recommendation raises a number of questions, including what types of anti-abuse measures would qualify for what types of incentives. Without a clear, agreed upon definition of abuse, this could be challenging. Coming to such a definition will, as the RySG knows from experience, be a long, complex process; following which, the parties must negotiate the relevant registry agreement amendments. Providing financial incentives to registries through a reduction in ICANN fees could have the unintended consequence of higher abuse rates from the increased availability of cheaper domains. While good actors will ensure proper countermeasures are in place when engaging in lower price selling, there is no guarantee that existing bad actors would take advantage of such incentives, or live up to their obligations under any such program, resulting in no net improvement to the current situation. Such incentives could also backfire and serve as a disincentive against registries that utilize “non-traditional” or innovative business models, such as restricted namespaces with higher operational costs and, as such, higher registration prices. Tracking the effectiveness of anti-abuse measures to determine whether the registry continues to qualify for the incentive would create a significant operational burden on ICANN, which could then increase operational costs. If this recommendation is accepted, the RySG notes that only offering incentives to completely open TLDs doesn’t go far enough to recognize the valuable protections strict registration policies or high prices or other mechanisms bring to the DNS. Any incentives ICANN might propose should include ALL actions taken by ROs to protect the TLD from technical abuse without a presumption or preference for a particular business model. With particular reference to the suggested inclusion of proactive abuse mitigation within the Registry Agreement, it is noted that such contractual obligations may have the potential to create an increased risk of legal liability for the registry operator. Should contracted parties accept a financial benefit in return for undertaking proactive abuse mitigation, a substantial risk occurs that should they fall short in this task (fail to discover (an) abuse(s), which may cause harm or loss (e.g. phishing, malware dissemination, botnet/C&C)). A registry operator, having accepted a specifically preventative responsibility in their RA, would be at a distinct legal disadvantage if attempting to disclaim liability, were they joined to any action arising out of such an abuse. The RySG reiterates its January 2018 comment. Furthermore, RySG notes that registries have to weigh much more than just “is abuse happening.” The decision matrix is complex and there are legal, business, and political outcomes to consider. This recommendation is extremely short-sighted and only looks at the issue of DNS abuse one-dimensionally.
- On recommendation 15, The RySG strongly opposes this Recommendation. Specification 11 of the new gTLD Registry Agreement states that new gTLD Registry Operators may only use ICANN-accredited registrars. To the extent that this recommendation pertains to new gTLD registries, that

would put ICANN org in the position of endeavoring to prevent the use of registrars that it accredits, which will likely violate a registry's equal access obligations. This recommendation attempts to force gTLD registries to do what ICANN cannot: indirectly control resellers. ICANN must not shift its Contractual Compliance responsibilities to ROs, which this Recommendation effectively seeks to do. Introducing additional policies or provisions to promote behavior beyond what is already mandated in registry and registrar agreements suggests that current enforcement of existing policies should be prioritized. If bad actors are identified, action should be taken by ICANN to discipline or de-accredit those actors, as occurs with other breaches of ICANN's agreements. Furthermore, the RySG opposes any scheme in which a contracted party is deemed guilty until it proves its innocence. ICANN has shown a great willingness through its DAAR program to consider third-party ("3P") abuse monitoring services to be "multiple verifiable reliable sources" when these 3P sources have not been vetted or reviewed by the community. ICANN must not suspend a contracted party and potentially destroy its reputation, based solely on 3P sources.** This is particularly true for ROs that are, or are affiliates of, publicly traded companies. ICANN's willingness to do – especially where ICANN Org has repeatedly stated its refusal to accept any liability for this potential damage – is irresponsible and inconsistent with ICANN's bylaws. The RySG strongly objects to placing the business and reputations of contracted parties at the whim, error, or (mis)interpretation of 3Ps. The CCT-RT must take into account that each of the 3P sources ICANN uses for DAAR has its own, independent (i.e. not controlled by any standards organization) definition of abuse. So does each contracted party. No community-defined process exists to classify a 3P abuse report of conduct that violates the 3P's "abuse" definition, but does not violate the relevant contracted party's "abuse" definition. ICANN must openly and transparently identify how it will address these and other concerns before it releases and relies upon DAAR. The RySG strongly disagrees with the proposal to create a DNS Abuse Dispute Resolution Procedure (DADRP). RySG have concerns about committing registry operators to be bound to a new DRP when contracts with ICANN already require that registries take measures to mitigate abuse. The DADRP proposal is premised upon the false assumption that registries are directly responsible for abuse within their TLDs; however, registries generally have no direct relationship with registrants and little control over how domains are used once registered. As is acknowledged in the CCT-RT's own report, registry-level safeguards have proven ineffective at reducing DNS abuse. Further, registries with the concentrations of abuse contemplated within the section are a small few, and are readily identifiable without relying upon a third-party trigger. Improvements should be made to the existing compliance function rather than relying upon a whole new procedure to handle enforcement in a very narrow subset of cases, where there is no evidence that such a procedure is necessary or would be effective in achieving its intended aim. The alternative of creating the DADRP creates uncertainty and potential operational burden for registries without clear benefit. RySG also refers again to the over reliance on 'blacklists' in this context. Whereas it can be accepted that data sourced from blacklists are useful as red flag indicators, the actual data remain formally unverified, and underlying evidence remains largely unavailable to any affected party. It is with much dismay that RySG notes the continued justification for the use of such sources based on nebulous concepts such as 'widespread use' and 'reputation', rather than on actual sound verification of the underlying data. It has been publicly accepted by ICANN Compliance (ICANN 60 DNS Abuse Reporting & Mitigation Session) that the use of such blacklists alone at the aggregate level, would not be deemed sufficient to ground contractual enforcement, and as such it is inappropriate to suggest that the same sources are somehow suitable to similarly ground a DRP. Developing this DADRP would require a significant outlay of time, energy and resources from the community – especially considering that there is no clear definition of "abuse" – with little obvious benefit or return on that effort. In addition, this recommendation raises the possibility of involving a third party in the interpretation of contracts, which is a proposition that the RySG cannot support. Any such step would require a GNSO PDP, at a minimum.

- On recommendation 16, The RySG supports the recommendation that ICANN conduct ongoing research on DNS abuse, but cautions against using the DNS Abuse Study to come to any conclusions and strongly opposes the use and publication of data from DAAR. While the RySG respects the intent and efforts of the researchers who conducted the DNS Abuse Study, the RySG

believes the study is flawed and it should not be the basis for any decisions. These flaws include: The study is self-referencing and, in many cases, only references prior work by the same authors (see the Reference list in the study where the authors repeatedly quote themselves). The study makes conclusions for which it provided no data or analysis in the text (despite no data about price, and only mentioning price twice as a side note, the study concludes that lower prices might be linked to abuse). The study circularly relies on the statements of the tools it chose to use, (i.e. citation to Spamhaus itself for its assertion that Spamhaus is a “near zero false positive list”). The RySG is not opposed to ongoing anonymized data collection to learn more about abusive behaviors but strongly recommends that the researchers chosen be required to provide clear reports that link every conclusion to a specific data point and analysis. Even though the RySG does note that the report contains some positive, and well-researched findings based on data (such as the findings that most new gTLDs are not havens for abuse or malware), the quality of the study is lacking enough that care should be taken when interpreting all of the results. Furthermore, as mentioned previously, ICANN has created DAAR behind closed doors, with no community consultation, and determined which 3Ps data feeds it will rely on, without input from the community. ICANN has apparently, in determining how “trusted” these 3Ps are, relied on the cost-benefit-risk analysis of corporate IT departments that pay for filtering rather than the needs and interests and concerns of the community, and particularly contracted parties. Although there is much benefit to be had in establishing reliable tools for the measurement and mitigation of abuse, which it is assumed is the ultimate aspiration for the DAAR project, any current reliance on DAAR is exceptionally premature. The CCT-RT should not recommend use of DAAR to monitor or police contracted parties, until the community has had a chance to discuss and debate the impact, benefits and risks to the various constituencies. In particular, the CCT-RT should not recommend that ICANN publish the data from DAAR until there is a mechanism in place for addressing community concerns that does not jeopardize the reputation or business of the RO without a fair and impartial investigation, and ICANN acknowledges its potential liability for reliance on DAAR. Furthermore, the RySG notes that the extensive public-relations campaign that ICANN Org is conducting for DAAR and its data is not a substitute for actual community consultation with the parties that will be affected by its use.

- On recommendation 17 - The RySG notes that the CCT-RT needs to define “reseller” before it can suggest that ICANN should track them all. Every private sale of a domain name is a “resale” so it is important for the community and the Board to understand exactly what it is been asked to approve here. At a minimum this would require a new PDP.
- On recommendation 18 - In light of GDPR, the EPDP, and the changing nature of Whois/RDDS, the RySG strongly recommends this recommendation be at least postponed, and possibly withdrawn, pending the outcome of the data privacy work. If the recommendation is not withdrawn the CCT-RT should first consider: what is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?
- On recommendation 19 - The Framework for Registry Operator to Respond to Security Threats was the result of voluntary, good faith discussions by registry operators and is not an ICANN Consensus policy. Future CCT Review Teams should bear in mind that the Framework itself is a voluntary and non-binding document, and as such, any evaluations of the Framework should seek to engage Registry Operators on a voluntary basis. ICANN's Compliance department should not be leveraged to gather data about the Framework. Further, future Review Teams should exercise caution in extrapolating conclusions that apply to all gTLD registries from such a review.
- On recommendation 20 - As the review team notes in the Report, the contractual requirement in the RA regarding this safeguard is narrowly defined to the following: “Registry Operator shall take reasonable steps to investigate and respond to any reports from law enforcement and governmental and quasi-governmental agencies of illegal conduct in connection with the use of the TLD.” As such, part (2) of the Recommendation 20 is inappropriate as it expands beyond Registry Operators' contractual obligations, especially given the fact that merely measuring the volume of inquiries does not necessarily provide a clear 30/47 picture of how much malicious conduct is actually taking place in a given gTLD. Abuse contacts, especially when published in an easily

accessible place, receive high volumes of spam and other insignificant emails that do not contain specific inquiries or complaints about demonstrable malicious conduct.

- On recommendation 21 - The wording of this recommendation should be updated to reflect that it pertains specifically to sensitive and regulated gTLD strings. Additionally, the RySG wishes to note that the remit of ICANN's Compliance department is to monitor contracted parties' compliance with terms of their respective ICANN contracts (in the case of registries, the Registry Agreement). This recommendation should not provide ICANN Compliance with justification to require Registry Operators to provide data about activities that extend beyond their compliance with the terms and provisions of their individual Registry Agreements.
- On recommendation 22 - This recommendation is overbroad and should be limited to sensitive and regulated TLD strings that have taken on an affirmative duty to protect the public in their PICs. The RySG are willing to have a discussion about what they are doing with respect to sensitive information, but the CCT-RT is once again reminded that they do not collect sensitive information on websites they do not control.
- On recommendation 23 - Again, the RySG wishes to note that the remit of ICANN's Compliance department is to monitor contracted parties' compliance with terms of their respective ICANN contracts (in the case of registries, the Registry Agreement). This recommendation should not provide ICANN Compliance with justification to require Registry Operators to provide data about activities that extend beyond their compliance with the terms and provisions of their individual Registry Agreements. While certain RySG members acknowledge that gathering data regarding the operation of gTLDs in highly-regulated sectors would be useful, the RySG urges that any data collection efforts should be voluntary.
- On recommendation 24 - The RySG notes that the safeguards mentioned in Recommendation 24 pertain only to a small group of new gTLDs and as a matter of course, the RySG does not comment on issues related to specific gTLD registries. That said, however, the RySG would like to point out that the report states, "It is not clear whether failure to comply with these safeguards has generated complaints," which presumes that such failures have occurred, despite providing no evidence to support that presumption.
- On recommendation 25 - This is a worthy goal, but latitude must be maintained following the application process for potential registries to add to voluntary PICs. It is not reasonable to assume every situation addressable by a voluntary PIC can be foreseen, as registries can attest from the 2012 round. What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost? The RySG reiterates its comments from 2017. While the RySG understands the review team's point about providing the ICANN community time to review such voluntary commitments, this recommendation would prevent future applicants from being able to adopt such commitments in response to feedback from the community or individual parties after applying for a gTLD but prior to delegating it. There may be value in providing such a capability.
- On recommendation 26 - The RySG recognizes the value in conducting this type of impact study, and that the complexity of the INTA Impact Study made it difficult for many respondents to complete the questionnaire. Going forward, ICANN should take steps to ensure that any studies conducted are optimized to solicit meaningful and statistically significant data from a representative sample of respondents.
- On recommendation 27 - It appears that this recommendation is already being followed through the work of the RPM PDP WG, which is reviewing the URS. In support of ICANN's policy development process, and for the sake of avoiding duplication of efforts, the RySG believes that allowing the RPM PDP WG to proceed with its work is sufficient to meet this recommendation. However, the RySG notes that the CCT-RT has only provided a list of suggestions, but no information as to what issues or problems led to them. The RySG believes it would be very helpful to the RPM PDP to include a reason for each suggestion. It trusts that the GNSO Council will duly consider the findings and recommendations that the RPM PDP WG produces in its Final Report regarding its phase one review of new gTLD RPMs.
- On recommendation 28 – the RySG agrees with a review of the TMCH—it was lauded as a system that would be put to extensive use by rights holders, but that is far from the actual case. What is

the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost? The RySG respectfully requests that the CCT-RT provide additional detail about how it believes such a cost-benefit analysis should be undertaken and what specific value it would add to the extensive evaluation of the TMCH already being undertaken by the RPM PDP WG. While the RPM PDP WG has been reviewing the TMCH, it has not engaged in any specific cost-benefit analysis. Given that the WG is still underway, in order for the GNSO to be able to adopt this recommendation, additional guidance from the CCT-RT would be helpful. The RySG also requests that the CCT-RT consider balancing the benefits of such an analysis with the time and resources required to undertake it.

- On recommendation 29 - This recommendation attempts to remain neutral in its language around whether a higher number of applications and delegations from the Global South should be objectives of subsequent new gTLD procedures, but the Success Measures pre-suppose that an increase in applications and delegations is a desirable and agreed-upon. This is fairly presumptuous on the part of the review team.
- On recommendation 30 - this recommendation pre-supposes that an increased number of applications and delegations from the Global South is a desirable and agreed-upon objective
- On recommendation 31 - What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?
- On recommendation 32 - The CCT Report clearly states that it was difficult to assess the effectiveness of the support program because there were only three applicants. The data the CCT-RT was able to obtain (through survey responses) cites the ongoing cost of operating a registry as a barrier to entry, rather than the application cost itself. As such, it is not clear how the CCT-RT reached the conclusion that the application fee should be reduced for all applicants.
- On recommendation 33 - RySG supports the recommendation in principle but has concerns about ICANN's ability to implement it. Furthermore, the RySG strongly opposes the "detail" section which seems to go far beyond giving the GAC a template for consensus advice. The "Detail" section suddenly adds new features: a role for individual GAC countries to object and an appeals mechanism.
- On recommendation 34 - The RySG believes that the New gTLD Subsequent Procedures PDP Working Group is already working on such a review of community-based gTLD applications. The RySG supports the PDP's ongoing work and cautions that a Review Team should not attempt to pre-suppose the outcome of any policy development process.
- On recommendation 35 - The RySG believes that the New gTLD Subsequent Procedures PDP Working Group is already working on such a review of community-based gTLD applications. The RySG supports the PDP's ongoing work and cautions that a Review Team should not attempt to pre-suppose the outcome of any policy development process.

IPC

- Applauds the introduction of additional metrics into the Final Report. It also supports the overall approach suggested by the CCT Review Team ("CCT-RT") in connection with achieving a healthier Domain Name System (DNS) environment. In particular, it supports: (1) the suggestion for specific measurements of the DNS marketplace, ensuring statistical significance of data; (2) the suggestion of incentives for contracted parties to implement additional safeguards against DNS abuse; and (3) the suggestion of additional disclosure of compliance-related data by relevant parties
- Supports Recommendations 1 - 4. Data-driven analysis and policy is always welcomed, including data demonstrating the impact on rights holders. In addition, more detail from ICANN Compliance (which has been requested for years) would be instructive, particularly as to how contractual compliance issues are actually resolved in practice.
- Supports Recommendation 5, as the data could prove useful to inform and complement primary market data.
- Supports Recommendation 7. This would be helpful data, particularly as it relates to the implications of parked domains on intellectual property rights holders (i.e. correlations between

domain parking and infringing domains or domains otherwise being used to perpetrate other DNS abuses that leverage intellectual property assets, such as phishing).

- Supports Recommendation 8 in principle, as this may be helpful information, but agrees it is a low priority for ICANN
- Supports Recommendation 9. An analysis of marketplace mechanisms addressing defensive registrations should be conducted prior to, or as part of, any policy development on the issue of rights protection mechanisms. The IPC understands that the RPM Review policy development process examined or is in the process of examining both mandatory RPMs and voluntary marketplace RPMs that relate to defensive registration (e.g. Sunrise), but other efforts should focus on the broader ecosystem of defensive registration and associated costs for brand owners, with an eye toward attempting to reduce such costs.
- Recommendation 10 - does not support the launch of a new PDP on this issue. There are too many areas of potential overlap with the current Expedited PDP on gTLD Registration Data, which has effectively been chartered for the suggested purpose in Recommendation 10. The IPC understands that ICANN and contracted parties must comply with applicable law, including privacy and data protection law, including through the implementation of domain name registration data processing related policies, and the IPC supports the notion that such data should be processed accordingly including disclosure for legitimate purposes including intellectual property and consumer protection, within ICANN's mandate to protect consumer trust in the DNS.
- Supports Recommendation 14. Such an initiative, with appropriate market-based incentives, has the potential to bring contracted parties and others together in alignment toward a common goal, namely to prevent and mitigate DNS abuse for the benefit of all Internet users globally.
- On recommendation 15 - strongly supports the proposed initiative to sharpen the ICANN Compliance department's ability to crack down on actors that have been a problem for the DNS historically. A DADRP is an intriguing idea and will need additional consideration by the community; IPC encourages such a discussion of this idea as well as development of a more concrete definition of "Security Abuse."
- Recommendation 16 - strongly supports this recommendation and has long been interested in more in-depth and frequent collection and publication of such data and actionable responses to problems identified.
- Recommendation 17 More information is required for assessment of this recommendation, but in concept, the IPC supports it.
- Supports Recommendation 20. The additional information it identifies would be helpful in measuring and addressing DNS abuse issues at a systematic macro level. It also supports the proposed solicitation of input from registry operators regarding their experiences in combating DNS abuse.
- Supports recommendations 21, 22, 24
- Supports Recommendation 25 in principle, but ICANN should not needlessly restrict the self-imposition by registries of PICs to only the application period. It may be in the community's interest for such commitments to be added after the application is submitted but prior to delegation.
- On recommendation 26 - Agrees it is critical to the credibility of any study to have a statistically significant set of data. That said, anecdotal data, or survey data that may fall short of achieving true statistical significance, can still be useful to inform policy discussions, and should not necessarily be dismissed out of hand.
- On recommendation 27, agrees that the appropriate forum for discussion regarding URS and UDRP related issues, including interoperability of the UDRP with the URS, is the ongoing RPM Review PDP. The RPM Review PDP working group has successfully collected some data to inform its discussions regarding the URS, and will likely have a similar level of success with respect to the UDRP. Thus, an assessment as to the need to conduct any further analysis or review of data regarding the URS and UDRP should await the completion of the RPM Review PDP, although basic relevant data on URS and UDRP cases will presumably continue to be collected voluntarily by dispute resolution service providers and third parties.

- On recommendation 28, supports the notion that analysis and review of the TMCH is within the purview of the RPM Review PDP, and notes that the PDP working group will likely engage in the kind of cost benefit analysis regarding the TMCH envisioned by the CCT-RT in developing its final recommendations on this mechanism.

ALAC:

- Does not share a sense of urgency when it comes to subsequent procedures but instead believe the community should address all of the deficiencies in the 2012 program before accepting additional applications.
- The first recommendation, surrounding the improved attention to data collection and use in policy development inside ICANN is perhaps the most critical recommendation in the report given the extent to which anecdotal evidence pervades most community discussions. The unavailability of data and a culture unused to its role continues to hamper policy development and other discussions within ICANN. While controversial, the recommendation to discuss a potential DADRP has merit given the high rates of abuse in some new gTLDs and the apparent lack of tools at the disposal of Contract Compliance to address it. The CCT recommendations include such tools but some sort of backstop in the form of a 3rd party adjudication mechanism that looks at a registry holistically might be necessary.
- It is also clear that better consistency is needed in the application evaluation and review process, including such issues as string confusion and review by the advisory committees including SSAC, GAC and ALAC. Finally, the ALAC continues to believe in the importance of the gTLD program's expansion into communities and underserved regions (the so-called "Global South").
- On recommendation 1 - Support. As ICANN is increasingly attempting to develop its path forward to comply with international privacy regimes via the EPDP and the Access Model, developing a workable system for data collection is preeminent but should not distract from the GAC's work in this regard.
- On recommendation 8-10 Support, but the CCT should defer Recommendation 10 (about privacy protections) until the recommendations from the EPDP and Access Model are finalized.
- On recommendation 11-13 Support. The expectation by users is an essential feature for consumer trust. The ICANN community must instill trust between the relationship between the name and the website content to ensure internet users are accessing the content they seek.
- On recommendation 14-25 Support. A healthy DNS system relies on competition and diversity of companies, big and small, applying for domains. The ALAC believes these recommendations are necessary to accomplish that goal.
- On recommendations 29-35 Support. Transparency is a prerequisite to maintaining the integrity of consumer trust in the DNS system and the ALAC believes the following provisions get us closer to that objective.

Section IV: Analysis of Comments

General Disclaimer: This section intends to provide an analysis and evaluation of the comments submitted along with explanations regarding the basis for any recommendations provided within the analysis.

ICANN organization observes that there are divergent opinions on the Final Report and Recommendations:

- Two (2) respondents (BC and ALAC) generally support recommendations: BC comments: "we generally support the suite of recommendations" and ALAC echoes by confirming it "is supportive of all of the recommendations in this report";
- One (1) considers the review team addressed its mandate incorrectly (JP): "The CCT Review failed to appropriately consider and evaluate the important and fundamental reasons why ICANN's new gTLDs program is a failure in the areas of competition, consumer trust, and consumer choice".

- Two (2) contributors express concerns regarding the content of the report and recommendations (RySG, NCSG). The RySG, for instance, comments: “most of its recommendations are overbroad, unsupported by data, or fiscally irresponsible, and many violate the terms of contracts with ICANN”, while NCSG enumerates three overarching concerns: 1) “the enormous and largely unwarranted data gathering recommendations that are presented with the report”; 2) “the fear that many recommendations push ICANN far beyond its limited scope and into the content-regulation arena”; 3) “the frustration that many Consumer Choice recommendations disproportionately favour one stakeholder [...] at the expense of the other Stakeholder Groups and Constituencies”. The RySG further urges the Board to adopt only recommendations that are within ICANN’s remit, fiscally responsible, and “likely to provide significant, meaningful data that will yield measurable results” and considers that recommendations which are “unworkable and overbroad will waste the community’s resources”. Moreover, the RySG and NCSG share a concern that some recommendations are not supported by the appropriate data or findings or are too broad for an appropriate consideration. For instance, NCSG on recommendation 11 writes: “Recommendation 11 is another inexplicable call for ICANN to perform market research about what gTLDs are visited.”

It should also be noted that the NCSG flags a number of recommendations (12, 13, 14, 20, 22) it considers to be outside of ICANN’s limited Mission and calls for rejection of or amendments to some of these recommendations: e.g. on recommendation 14: “this recommendation is beyond the scope and mission, limits, and competence of ICANN and the ICANN community. It must be deleted or modified to the scope and mission of ICANN”. NCSG also believes that recommendations 17-18 “are beyond the scope of this Review Team”, makes a reference to the Expedited Policy Development Process and urges “that this recommendation be dropped”. RySG echoes this assessment and “recommends this recommendation be at least postponed, and possibly withdrawn, pending the outcome of the data privacy work”.

RySG suggests some recommendations violate contracts (e.g. recommendation 15 – 20 – 21). On recommendation 15, it comments: “To the extent that this recommendation pertains to new gTLD registries, that would put ICANN org in the position of endeavoring to prevent the use of registrars that it accredits, which will likely violate a registry’s equal access obligations. This recommendation attempts to force gTLD registries to do what ICANN cannot: indirectly control resellers.”

Several contributors (e.g. GAC, ALAC, NABP, IPC) expressed specific support for selected recommendations, while others indicated objections and concerns with recommendations (NCSG, IPC, RySG). There are instances where contributors who support a given recommendation flag potential challenges: for example, NABP on recommendation 14 comments that “while any mandatory amendments to existing Registry Agreements would give rise to logistical and diplomatic challenges, incorporating such provisions in subsequent rounds of new gTLDs seems reasonable and desirable”.

ICANN organization observes a lack of community agreement on the set of recommendations, as highlighted in the table below. For example, on recommendation 15, despite the six (6) agreements recorded, both NCSG and RySG oppose this recommendation.

ICANN organization also notes absence of community alignment on how resources should be allocated. For example, GAC believes recommendation 8 should “be amongst the more urgent priorities, while RySG questions: “What is the perceived benefit of this recommendation, what would the cost be to carry it out, and would the benefit exceed the cost?”. The RySG raises concerns associated with implementation costs and limited community resources in multiple recommendations (e.g. recommendations 5, 6, 8, 11, 12, 15, 18, 25, 28, 31).

On the referral of recommendations to community groups, while the BC comments: “Topics such as improving safeguards for TLDs in highly-regulated industries and effectuating voluntary commitments by new gTLD are important topics for the New gTLD Subsequent Procedures Working Group”, some

commenters expressed concerns that some of the recommendations are directed at parts of the ICANN community. The RySG notes that the New gTLD Subsequent Procedures PDP WG is aware of the CCT recommendations and cautions against recommendations that “pre-suppose the outcome of any policy development process” (recommendations 34 – 35). The NCSG marks recommendation 28 as “must be deleted” and suggests that “such work and associated decisions be dealt with separately by the RPM WG”.

Lack of clarity and/or information is also flagged as problematic in the feedback received. For instance, RySG on recommendation 12: “The nature of incentives isn’t stated and therefore cannot yet be considered for support”. Agreements in principle are also provided due to the lack of certainty: IPC on recommendation 17 writes: “More information is required for assessment of this recommendation, but in concept, the IPC supports it.”

ICANN organization observes disagreements on what commenters consider ought to be prerequisites: for example, JP believes recommendations 1-16 “should all be prerequisite or priority level, while NCSG would ‘reject the prerequisite’ status of all of the recommendations in 9, 11, and 12”. ALAC does “not share a sense of urgency when it comes to subsequent procedures” and INTA is of the opinion: “no subsequent round of unrestricted new gTLDs should be launched until: a) more data is collected and analyzed regarding the impact upon trademark owners and upon overall domain name system (DNS) competition resulting from the first round; b) ICANN’s Review of all Rights Protection Mechanisms in all gTLDs PDP Working Group (“the RPMs Review”) completes and the Board approves its Phase I analysis of the effectiveness of the RPMs created as part of the new gTLD program; c) any strengthening of RPMs recommended in Phase I of the RPMs Review has been considered and adopted by the GNSO Council and ICANN Board and is on track to be implemented.”

Dependencies were also emphasized in this context: INTA “suggests the introduction of the European Union’s General Data Protection Regulation (GDPR), ICANN’s adoption of the Temporary Specification for gTLD Registration Data, and the subsequent changes in the publicly available WHOIS data have substantially reduced the effectiveness of the WHOIS system and the RPMs” and “strongly urges the ICANN Board, in considering the Final Report as a prerequisite for any subsequent round of domain registries, to also require that a Uniform Access Model for domain name registrant information be in place before approving such rounds”.

Five responders (5) (BC, JP, INTA, NCSG, RySG) made a reference to their prior input submitted on the CCT Draft Report and/or New Sections to the CCT Draft Report public comment proceedings, and two (2) raised concern as to how these were processed: NCSG notes that its concerns are still valid, while RySG questions whether the review team considered its comments. In Appendix D of their Final Report, the CCT provides an overview of the approach used to address public comments received.

Commenters did not comment nor were required to provide input on all recommendations. The information in the table below was assembled based on comments with a clear indication of support or objection for specific recommendations and was designed to help readers visualize level of support:

S: contributor indicates explicit support for recommendation NS: Does not support recommendation or its components /: Does not provide input or explicit support for/objection to recommendation	BC	JP	INTA	NCSG	GAC	NABP	RySG	IPC	ALAC	TOTAL		
											Yes	No
Concerns with report	No	Yes	/	Yes	/	/	Yes	/	No	3	2	4
										S	NS	/
Rec. 1	S	/	/	/	S	/	/	S	S	4	0	5
Rec. 2	S	/	/	/	/	/	NS	S	S	3	1	5
Rec. 3	S	/	/	/	/	/	NS	S	S	3	1	5
Rec. 4	S	/	/	/	/	/	NS	S	S	3	1	5
Rec. 5	S	/	/	NS	/	/	NS	S	S	3	2	4
Rec. 6	S	/	/	NS	/	/	NS	/	S	2	2	5
Rec. 7	S	/	/	/	/	/	NS	S	S	3	1	5
Rec. 8	S	/	/	NS	S	/	NS	S	S	4	2	3
Rec. 9	S	/	/	NS	/	/	NS	S	S	3	2	4
Rec. 10	S	/	/	/	/	/	NS	NS	S	2	2	5
Rec. 11	S	/	/	NS	S	/	NS	/	S	3	2	4
Rec. 12	S	/	/	NS	S	S	NS	/	S	4	2	3
Rec. 13	S	/	/	NS	S	S	NS	/	S	4	2	3
Rec. 14	S	/	/	NS	S	S	NS	S	S	5	2	2
Rec. 15	S	/	S	NS	S	S	NS	S	S	6	2	1

Rec. 16	S	/	/	/	S	S	NS	S	S	5	1	3
Rec. 17	S	/	/	NS	S	/	NS	S	S	4	2	3
Rec. 18	S	/	/	NS	S	/	NS	/	S	3	2	4
Rec. 19	S	/	/	/	/	/	/	/	S	2	0	7
Rec. 20	S	/	/	NS	S	/	NS	S	S	4	2	3
Rec. 21	S	/	/	NS	S	/	NS	S	S	4	2	3
Rec. 22	S	/	/	NS	/	S	NS	S	S	4	2	3
Rec. 23	S	/	/	/	S	S	NS	/	S	4	1	4
Rec. 24	S	/	/	NS	/	/	/	S	S	3	1	5
Rec. 25	S	/	/	/	/	S	NS	S	S	4	1	4
Rec. 26	S	/	/	NS	/	/	/	S	S	3	1	5
Rec. 27	S	/	/	/	/	/	/	S	S	3	0	6
Rec. 28	S	/	/	NS	/	/	/	S	S	3	1	5
Rec. 29	S	/	/	/	S	/	/	/	S	3	0	6
Rec. 30	S	/	/	/	S	/	/	/	S	3	0	6
Rec. 31	S	/	/	/	S	/	NS	/	S	3	1	5
Rec. 32	S	/	/	/	S	/	NS	/	S	3	1	5
Rec. 33	S	/	/	/	/	/	NS	/	S	2	1	5
Rec. 34	S	/	/	/	S	/	/	/	S	3	0	6
Rec. 35	S	/	/	/	/	/	/	/	S	2	0	7