

Report of Public Comments

Title:	Proposed Renewal of .ORG gTLD Registry Agreement		
Publication Date:	13 August 2013		
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Comment & Reply Periods:		Important Information Links	
Open Date:	21 June 2013		Announcement
Close Date:	12 August 2013		Public Comment Box
Time (UTC):	23:59		View Comments Submitted
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Section I: General Overview and Next Steps			
Following the closure of the public comment period and the publication of this report of public comments, the next step will be for the ICANN Board to consider the proposal and the related public comment at the next available meeting.			
Section II: Contributors			
Section III: Summary of Comments			
<p><i>General Disclaimer: This section is intended to broadly and comprehensively summarize the comments submitted to this Forum, but not to address every specific position stated by each contributor. Staff 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).</i></p>			
SPECIFIC COMMENTS			
<u>Whois Requirements (Section 3.1 (c)(v))</u>			
In terms of Section 3.1(c)(v), IPC applauds the recognition that ICANN’s Internic web page could serve as a portal for cross-registry Whois access, as recommended by the Whois Policy Review Team, and that therefore Whois data from .ORG should be supplied in a compatible format. This obligation should not be limited to apply only to the Internic interface “as it exists as of the effective date of the agreement,” but also as it may be modified from time to time. <i>IPC (8 August 2013)</i>			
IPC also supports the new requirement for .ORG to provide links to the forthcoming ICANN page “containing Whois policy and education materials.” This provision should be expanded to cover links to any cross-registry registration data service operated by or on behalf of ICANN (such as the Internic service called for by the Whois Policy Review Team, or the common interface for global Whois search that is being created pursuant to the Board’s November 2012 Whois resolutions). <i>IPC (8 August 2013)</i>			
<u>Access to Registry Services (Section 7.1(a))</u>			

ICANN should be commended for efforts to expand the benefits of the 2013 RAA as broadly as possible. In fact, Section 7.1(a) should be strengthened by deleting the last sentence of Section 7.1(a)(viii), which without justification makes the .ORG obligation to require 2013 RAA adherence conditional on Verisign (com/net), Neustar (biz) and Afilias (info) making similar requests. At a minimum the sentence should be revised so that the obligation becomes operable as soon as the same 2/3 threshold is reached in all 4 gTLDs, whether or not this has triggered a registry request for this revision. Otherwise, as currently drafted the .ORG agreement will permit registry operators such as Verisign to indefinitely delay the transition, and no other major legacy gTLD will be required to impose the 2013 RAA requirement until Verisign decides to do so. *IPC (8 August 2013)*

Uniform Rapid Suspension (URS)

ICANN should amend the .ORG contract to provide for a timely and reasonable transition to the applicable consumer protection mechanism--the URS system--that will be required for all new gTLDs. *IPC (8 August 2013)*

Section IV: Analysis of Comments

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

Access to Registry Services

ICANN takes note of the comments raised regarding the new provision included in the .ORG Registry Agreement to facilitate the transition of its registrars to the 2013 Registrar Accreditation Agreement approved by the ICANN Board. The new provision was included to help expand the benefits of the 2013 RAA.

Rights Protection Mechanisms

The .ORG renewal proposal does not include a requirement to comply with the Uniform Rapid Suspension (URS) rights protection mechanism (RPMs). This RPM has so far only been approved in the context of new gTLDs. The URS is new and requires a "ramp-up" period before it is able to absorb the full workload of the entire gTLD namespace. Additionally, registrants have procured domain names in existing gTLDs with an understanding of the landscape of existing RPMs. New RPMs affect registrants, as well as registries and registrars. They should be introduced in existing gTLDs after a bottom-up community discussion.