



Renewal Proposal

for the

.COOP Sponsored Top Level Domain

By

DotCooperation LLC

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# 1. Report to ICANN on DotCooperation LLC Sponsorship of the .coop sTLD

## a. Meeting the Needs of the Cooperative Community

DotCooperation LLC (dotCoop) has successfully created one of the first three Sponsored Top Level Domains. Operationally and conceptually, dotCoop has met the goals of ICANN and of the global cooperative community to create a home for cooperatives on the Internet.

From the beginning of the proposal process, co-ops and cooperative associations have been supportive of the way that .coop would highlight the desire of co-ops to help build and reinforce cooperative identity among their members and the general Internet community. Co-ops from a variety of sectors and countries joined in an enthusiastic endorsement of .coop during the proposal phase and then validated that response by reserving names prior to the official launch in January 2002.

On January 30, 2002, a little more than 60 days after the agreement with ICANN was signed, dotCoop was able to successfully open our Sponsor site at [www.nic.coop](http://www.nic.coop) and begin accepting domain registrations and successfully supporting .coop web sites and email traffic.

From the beginning, dotCoop was able to maintain the value of the Sponsored TLD by adhering strictly to the .coop Charter. DotCoop has used a combination of manual and random checks to ensure that the .coop domain truly represents the members of its community. We have, as a result, frequently turned away potential registrants. The dotCoop Board of Managers has reviewed the eligibility issue several times based on inquiries received by the dotCoop and has continued to confirm the basic Eligibility Criteria. And our Verification Policy process and procedures has been reviewed as part of ICANN surveys and found to be doing the job well for our registrants.

On July 1, 2002, we began accepting application from ICANN accredited registrars to become .coop registrars and on October 1, 2002, we met the deadline of providing .coop registrants full registrar-based services. Since then, we have been able to secure the services of six registrars to provide a variety of services for our registrants. This required continuing outreach efforts to the registrar community so that we could try to provide cooperatives around the world access to registration processes in their own languages and currencies. Currently we have four registrars based in Europe that provide registrations in a variety of languages. In addition, we have one registrar in the United States and one registrar in Japan that provide direct support to their target markets along with a variety of services such as e-mail, web hosting and other valuable services.

Eligible registrants from around the world have responded. Although the early registrations were in the majority from the United States because of the active marketing by the local cooperative association and the general acceptance of the Internet in that market, dotCoop has been pleased to see that many co-ops from around the world have registered and use their .coop domain. Currently more than one third of the names are registered by co-ops outside of the United States. We continue to work with the International Co-operative Alliance to try to develop programs that will make the .coop domain more accessible to more eligible registrants.

DotCoop has been an active member of the ICANN community and has participated in the gTLD Registries Constituency Group as well as various committees and groups within that organization. We have worked closely with the other Sponsored TLDs to ensure that we provide the input to ICANN that was needed from this new group and have provided input to the larger constituency to address the differences in our contract structures. We have also fully participated in both of the surveys that were done by ICANN to provide input to the process for the current new Sponsored TLDs. We take our commitment to the ICANN community as well as the cooperative community seriously and try to address needs in both groups.

And, of course, dotCoop continues to look for ways to meet the needs of its registrants and the entire cooperative community. DotCoop provides a registry newsletter that highlights new registrants and provides technical information to registrants and others interested in .coop. In late 2004, we added a directory that provides links to all active .coop sites which allows people looking for a local co-op to have a location where they know they can locate a co-op and not just something that calls itself a co-op. We are currently investigating ways to work with registrars to offer lower pricing to co-ops that are unable to take advantage of .coop because of cost issues through a program that we hope will begin to address the “digital divide” which was one of our original goals.

We continue to work closely with individual co-ops and cooperative associations and also with the International Co-operative Alliance based in Geneva. They provide both verification support and serve as local contacts for dotCoop and our registrars. Currently, ICA has 221 member organizations from 88 countries, representing more than 800 million individuals worldwide. They continue to highlight .coop in their international e-newsletter and use .coop for their own web site and e-mail.

Leading cooperatives and cooperative associations around the world have chosen to register and use .coop domains. From one of the leading cooperative banks in France – Caisse Centrale de Crédit Coopératif ([www.credit-cooperatif.coop](http://www.credit-cooperatif.coop)) to the leading insurance cooperative in

Singapore ([www.income.coop](http://www.income.coop)) and the leading cooperative association in the UK ([www.cooperatives-uk.coop](http://www.cooperatives-uk.coop)), the .coop domain has garnered wide support among acknowledged leaders in the cooperative community. But in addition, we have provided small worker co-ops in Canada ([www.tech.coop](http://www.tech.coop)) and telephone co-ops in Argentina ([www.perico.coop](http://www.perico.coop)) a way to promote their cooperative identity.

In addition, the dotCoop Board of Managers provides us with a diverse perspective on policy decisions. There are currently ten members of the Board. Fifty percent (50%) of the Board members are from outside of the United States. The ICA nominates one third of Board members to ensure international participation but international members have also been nominated for the Board by the Board of Directors of the National Cooperative Business Association to increase international participation as originally envisioned. Since the Board size can be increased, dotCoop hopes to continue a program of including Board members to represent as many areas and sectors of the cooperative community as possible while maintaining an active Board that is an active part of the international cooperative community. Current Board members come from the following countries:

France  
India  
Puerto Rico  
Singapore  
United Kingdom  
United States

We continue to look for those who can serve on the Board from a variety of co-ops and cooperative organizations - from smaller worker co-ops to large financial co-ops with hundreds of thousands of members.

DotCoop maintains its goal to look for ways to serve our cooperative community as well as the Internet community. DotCoop has provided a new way for cooperatives to be able to promote their cooperative identity. Although we need to expand our registration base so that we can provide additional value to our registrants, the most critical need that is reiterated by our registrants is the value of a verified domain. We continue to use our community contacts to promote that message in our marketing and through our registrars' marketing.

## **b. The .Coop Charter – Proposed Enhancements**

In general, the Charter has proven to be a resilient document that we have been able to use in the way that it was intended. DotCoop staff and the dotCoop Board of Managers have chosen to interpret the Charter very strictly

and there have been no challenges to the Charter or to our interpretation of the Charter.

There have only been two actual incidents where the registrant contested the eligibility decision. One was simply over whether a registration refund was due and one was actually over eligibility. That eligibility issue was never actually taken to dispute resolution but was later presented to the ICANN Ombudsman who agreed that dotCoop has acted properly in denying the registration.

DotCoop has worked closely with our registrars to ensure that verifications generally take place within the grace period to minimize registrar liability. In addition, we offer registrants pre-verification upon request. That means that we do the verification before they actually register a domain so that they can be assured that they are actually eligible for a domain in the .coop TLD. This is also a service to our registrars as it prevents extra work on their part to deal with ineligible registrants.

In light of the success of the Charter definition and the implementation process, there are only two changes that we feel should be made to the .coop Charter in order to provide more clarity for potential registrants.

First, 3.a and 3.b should be modified so that it is clear which members of NCBA and the ICA are eligible. Some types of associate membership are open to individuals and other non-eligible entities. These items should be modified as follows (see **bold**)

3(a) members of the National cooperative Business Association (NCBA) **if otherwise eligible;**

3(b) members of ICA **if otherwise eligible;**

Second, 3(f) should be modified to reflect how dotCoop and its Board have consistently interpreted this criterion (see **bold**) so that co-ops have this information available as they begin their decision on a .coop domain:

3(f) organizations that are **majority** controlled by cooperatives;

No other changes are needed at this time.

### **c. Compliance with TLD Sponsorship Agreement**

DotCoop has worked to meet all Sponsor obligations of the .coop Sponsorship Agreement as identified in section 3 of the Agreement. As confirmed by the evaluations done by ICANN in 2003, dotCoop has held to its mission of providing a stable environment for its registrants that provides the degree of

trust in the verification process that was envisioned by ICANN when it selected .coop as one of the first group of Sponsored TLDs in 2000 (<http://www.icann.org/committees/ntepptf/stld-compliance-report-25feb03.htm>).

And except for those requirements in section 3.12 relating specifically to Data Escrow, dotCoop has been able to continue to meet the exact specifications in the ICANN agreement. With respect to data escrow, dotCoop has actively worked with its current registry operator to provide the functional equivalent of the defined data escrow process. We have rock-solid ability to provide continuity to our registrants in case of catastrophic failure of the registry system. The following paragraphs describe the escrow systems we have already put in place.

A full backup is performed and verified on a nightly basis by the registry operator in the format defined in Attachment 18 of the Agreement. Each nightly backup file is archived on the registry operator's networks at two geographically different locations.

Each week, the complete set of nightly backups for the week is archived to CD media and is stored at the registry operator site for one year.

On a monthly basis, the backup for the first Saturday of the month is encrypted and then transferred via FTP to an off-site vendor. The registry operator performs an internal verification against the current system schema before encryption. Verification is performed by the 3<sup>rd</sup> party vendor to ensure that this backup has been properly transferred. This backup is maintained in a secure site by the vendor. In addition, the registry operator maintains two copies of this same monthly extract in two geographically different locations.

There are then three sets of backups for the required data:

1. A once-a-month backup is stored with the data escrow agents at a secure location.
2. A week's set of daily backups stored on CD media at the registry operator site.
3. A daily full copy stored on network storage at two geographically different sites.

Of course, normal system backups are also performed in addition to the specific data escrow process.

This backup process is more than sufficient to ensure that the registrants' data is secure – as it has been since January 2002.

It should also be noted that the .coop registry operator was unable to locate a firm in the United Kingdom where they are located that would perform data escrow services under a contract governed by the laws of the State of California. Otherwise, this would have required the registry operator to execute a contract with a US firm which would have proven prohibitively expensive as only Iron Mountain IPS was identified as providing the complete data escrow services defined in the ICANN contract. We are very confident that the above backups meet the desired goals of ICANN of providing a secure backup for .coop registrants at a fiscally-responsible cost to the registrants and to dotCoop.

## **2. Terms of Renewal**

DotCooperation LLC acknowledges that the terms of the new agreement will be “substantially consistent with the terms of agreements between ICANN and Sponsors of other Sponsored TLDs then in effect” [section 5.2.5] but would like to see that certain integral differences created by the terms of the original contract are taken into account in the final agreement that is reached with ICANN.

DotCoop is pleased that ICANN has worked to address some of the “rough spots” in the new sponsored TLD contract template. Certainly, the improvements made to those early documents provide a vehicle that will support an ongoing relationship between ICANN and the variety of sponsors that have added to the choices available to Internet consumers.

The following items should be considered for inclusion in the new contract for the continuance of the .coop TLD:

1. DotCoop and its registry operator will continue to monitor the availability of data escrow or mirror sites that would provide the full data escrow services at a commercially reasonable fee for the registry. In the interim, dotCoop will continue its current process which is “technically and practically sufficient to allow a successor registry to assume management of the TLD” as noted in the current template.
2. The delegation of responsibilities by ICANN to the Sponsor as detailed in Attachment 2 of the current agreement should be maintained. As part of its original agreement, any profits generated by the .coop TLD will be channeled to the support of bridging the gap or “digital divide” that exists in many areas of the world that are served by large numbers of cooperatives. Reducing the ability of dotCoop to set policies and create services that will support the differing needs of its constituency will reduce its ability to offer a truly “alternative” domain that provides a unique value to the members of the cooperative community. It should be noted that dotCoop continues to try to adhere as closely as possible to all

ICANN policies so that .coop registrants have the benefits of these policies that support security and stability for our registrants along with variations that provide added value to our registrants in such areas as facilitating requested transfers between registrars and reducing opportunities for cyber-squatting.

3. Inconsistencies between the original words reserved from registration and the current list should be resolved (Attachments 11 and 13 in current agreement.)
4. The current fee structure should be retained so that current registrars and registrants will not be negatively impacted by additional charges.
5. The contract should take into consideration that the current schema for the .coop TLD includes custom data elements used for Sponsor verification purposes and reflect this appropriately.

### **3. Conclusion**

DotCoop continues to be fully committed to its world-wide cooperative community and is dedicated to working with ICANN to continue as a committed member of the ICANN and Internet community.

We are pleased that our Board members and registrants represent co-ops from a variety of countries and sectors. Co-ops large and small have committed themselves to the .coop TLD for the long-run with long term registrations and renewals.

And dotCoop is also committed to the .coop TLD and to the cooperative community for the long term.