

Review of the Draft Applicant Support Program (ASP) Handbook – New gTLD Program

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1. Do you believe that Section 1 (“Introduction”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes

2. Do you believe that Section 2 (“Overview”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes, but with the following suggested clarification(s)

Recommendation 17.1 specifically states that applicant support include professional fees, such as attorney's fees, related to the preparation of an application. This section appears to limit professional help to truly "pro bono" services.

3. Do you believe that Section 3 (“Applicant Support Program Timeline”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes, but with the following suggested clarification(s)

While section 3 accurately reflects the relevant policy recommendations, the BC is concerned about the following statement: Though, depending on the volume of ASP applications received in the final weeks of the ASP application submission period, applicants may not know whether they have qualified for support in advance of the gTLD application submission period. The BC is concerned that applicants using the ASP process will expend significant amounts of time on ASP applications, only to have the gTLD applications open without certainty about their funding. This period of time may also create an opportunity for others to "game" the system filing applications for known popular gTLDs before ASP applicants have the opportunity.

4. Do you believe that Section 4 (“Reduction of New gTLD Program Application and Evaluation Fees”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes

5. Do you believe that Section 5 (“Applicant Eligibility and Evaluation Criteria”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

No, ASP handbook does not accurately reflect policy recommendations

Section 5 does not contain paragraph 17.17 of the implementation guidance. This paragraph is particularly important to prevent those who use the ASP program from transferring their applications to entities who might generally be disqualified from the ASP program. The restriction in paragraph 6.1 regarding "changes" does not prevent such a transfer, since a transfer might take place after an application has been reviewed and approved.

6. Do you believe that Section 6 (“Applicant Support Program Application Process”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes

7. Do you believe that Section 7 (“ASP Application Evaluation”) of the ASP Handbook accurately reflects the relevant policy recommendations on Applicant Support?

Yes, but with the following suggested clarification(s)

The BC did not find support in the SubPro report for the outsourcing of the applicant support review panels. The BC notes that the ICANN community is made up of members who have significant experience in the areas that are to be outsourced. The BC questions whether incurring an expense of this nature conflicts with the goals of the ASP program, and creates an expense that draws money from the program.

Other Comments

The BC appreciates the work that has gone into the ASP handbook. The handbook is quite detailed and dense. In addition, it has a number of acronyms and procedures that may not be well known within the communities targeted by the ASP. The BC suggests that the ASP contain a step-by-step applicant check list to facilitate understanding.

Summary of Submission

The BC appreciates the work that has gone into conforming the ASP handbook to SubPro recommendations. In our comment, we note several instances where the handbook draft should be amended to reflect SubPro specifications.

This comment was drafted by David Snead and Vivek Goyal. It was approved in accord with the BC Charter.