The geoTLD.group represents the interests of 36 geographic TLDs identifying a city, region, language or culture. Our members include government entities, companies and associations. After four years of operations for our early adopters such as .berlin, geoTLDs today represent a range of TLDs, including .tokyo, .bzh, .barcelona and .sydney.

Each geoTLD has cultivated an ethos of service to its community, prioritising actual usage and local presence on and offline, and zero-tolerance of abuse, over short-term financial imperatives. These were the commitments the geoTLDs made in their applications to ICANN and towards the relevant government(s), and they will continue to be fulfilled as each registry serves its community and the public interest.

We appreciate the work of co-chairs, work track leaders and members of the new gTLD Subsequent Procedures Policy Development Process for their hard work and commitment to determine what, if any changes may be required to the existing Introduction of New Generic Top-Level Domains policy recommendations from 8 August 2007.

As active member of the new gTLD Subsequent Procedures Policy Development Process and founder of the geoTLD concept, we would like to offer our comments to the Initial Report on the new gTLD Subsequent Procedures Policy Development Process (Overarching Issues & Work Tracks 1-4):

Many efforts have been made in the past to make ICANN more inclusive, balanced and effective. Still, there is no real level-playing-field when it comes to applicants and the terms, under which applicants apply-for a TLD. Some applicants represent the biggest metropoles on the planet, some are from small regions; some are niche players, others are Fortune 500 or pure investors. Each application targets a unique global resource, so we have to ensure that we award them in a responsible manner.

Comment on 2.2.2.: Predictability

geoTLD applicants suffered from the lack of predictability in the previous round, especially when it came to timing As we typically work with local, regional or national governments, questions like "when will the next application window open" or "what will the acceptance criteria be" are frequently asked. Governments can usually not act on last-minute requests, have difficulties substituting organisations for individuals or determine how and who should issue items like a support letter.

Smaller geoTLD applicants found the burden of sudden new "implementations" like Controlled Interruption phase and the Trademark Claims service on top of their tight budgets, demanding. This has been especially important since a geoTLD more often opens its TLD in phases to different groups including local government, companies and citizens. Predictability for such phased launches, when needing to synchronise with government timelines and imperatives, is crucial; marked more so than for nimble independent open TLDs.

For future rounds, we therefore have to improve and provide geoTLD applicants and the respective governments a more trustworthy and reliable framework; with enough lead-time and clarity to cater for government processes.

Comment on 2.2.2.2.: Clarity of Application Process

The substantive/disruptive changes to the application process created confusions and generated a lack of clarity for applicants. For instance, the following changes had huge impacts on the understanding of the program:

- The handling of the priority process (electronic archery, lottery etc.)
- The TMCH program
- Sunrise / Landrush priority rules regarding Brands vs public entities
- Pioneer programs

This lack of clarity during the program increased the risk of application cancellations and delays having significant financial consequences for applicants.

Although the new gTLD Applicant guidebook was published in June 2012, most of the geoTLDs were delegated only two years later (the first geoTLD to start its landrush phase was .berlin in March of 2014) and struggled to precisely define their launch program with predictable dates in this context.

For that reason, we fully support comment 2.2.2.2.C.1 regarding a mechanism that would allow impacted applicants the opportunity to either (a) request an appropriate refund or (b) be tracked into a parallel process that deals with the discrete issues directly without impacting the rest of the program.

We then strongly recommend that both the Applicant guidebook and the Registry Agreement are provided in their final version at the beginning of the program.

Comment on 2.2.4: Different TLD Types

Overall, we think that the current TLD Types are sufficient. Nevertheless, to provide greater clarity for applicants, the geoTLD.group supports the preliminary recommendation 2.2.4.c.1 in adding a ".Brand TLDs" category.

Beyond that, we see no value in creating further categories as all applications in the last round seemed to fit into one or more of the existing categories. If there was a demand (in later rounds) to differentiate TLD types and therefore create new categories of TLD types, we recommend discussing their creation within the framework of a bespoke PDP.

Comment on 2.7.1.: Reserved Names

A geoTLD represents a city, region or other geographic entity on the Internet, so space is crucial: For Governmental entities, their duties, campaigns, sights within the city, and the inventory a city owns. Representing such TLDs, we would like to answer on 2.7.1.e.1: We request that the number of Reserved Names be lifted to 1,000 in order to accommodate the special circumstances of geoTLD namespaces. Geographic namespaces have a broad set of target groups – from city administration, to companies, citizens, associations and others – and thus a large community with different needs. Those needs have to be respected.

Regarding 2.7.1.e.2, we do not recommend removing the reservation of 2-character strings as they might resemble ccTLDs and cause confusion among consumers.

Regarding 2.7.1.e.3.1, we are of the opinion that there should be no limit to the number of names reserved by a registry operator. As mentioned before, geographic namespaces have a broad set of target groups and thus a large community with different needs. Those needs must be respected. With regards to 2.7.1.e.3.2 we request that there be no limit for geoTLDs.

With city administration involved in our daily operations, we have substantial experience of the gap between ICANN and public administrative processes. Asking geoTLDs to follow a route where formerly reserved names have to go through a Sunrise phase is simply not do-able. Typically, many reserved names under geoTLDs are reserved for public administration tasks, which make those names unavailable for any other entity than the administration itself. In our experience, issuing Claims Notices for reserved names is more than sufficient; we never had any complaint during such releases.

We thank you for the opportunity to comment.

Katrin Ohlmer

Representing the geoTLD.group