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Thomas Rickert ICANN representative Prague ICANN meeting 2012

The «new gTLD program is the result of seven years of international consultation and debate among a wide variety of Internet stakeholders». Nonetheless, since 2008, PointQuébec has witnessed several questionable decisions concerning the new gTLD program, recriminations from various stakeholders to modify it and different points of view in order to ensure a more appropriate governance mechanism in compliance with the goal pursued with the program.

PointQuébec applaudes ICANN's recent decision to suspend the digital archery process and urges ICANN to reject this inequitable approach. The archery process is a flawed lotery game that would penalize PointQuébec and other new TLD applicants. It generates costs, with no guarantee of success.

For instance, PointQuébec has only 10 to 15% chances of success for a gTLD in 2013 simply because of the important volume of applicants based in North America, while applicants from other regions may have a 100% success rate possible because the number of applications submitted to ICANN has fewer brandnames. The geographical distribution proposed by ICANN unduly penalizes PointQuebec.

PointQuébec is not competing with anyone and we do not have to play this unfair game. For example, such a process would never be tolerated in our governments to discriminate service providers on the grounds that they failed a test of archery, regardless of the quality of the proposal, its admissibility, eligibility, or the filing of a bid guarantee.

Morover, ICANN will suffer in many ways from such an unethical decision, in terms of reputation and capability to undertake this process in a way that better meets the core values of ICANN.

- [i] Make allocation and assignment decisions by applying documented policies neutrally and objectively.
- [j] Act with a speed that is responsive to the needs of the Internet but obtain informed input from those most affected as part of the decision-making process.
- [k] Remain accountable to the forward Internet community through mechanisms that enhance ICANN's effectiveness.

Secondly, how can we mix applicants who apply for 50 or more trademark TLDs with applicants proposing a single new geographic or linguistic TLD unrelated to trade names? How can one seriously compare a trademark with the promotion of a language or a culture? How can we make such a shortcut that would at the end benefit the richest applicants, when the purpose of ICANN is «to ensure that the decisions of ICANN are made in the interest of the global Internet community»?

## What we propose: three groups in a one batch process

Following monday's open discussion on new TLDs, Point-Quebec wants to propose to ICANN the following sequence as criterias to introduce new TLDs on the rooting system.

1- There is first a limited number of linguistic, cultural, geographical and municipal applications accounting for just over a hundred applications, such as Point-Quebec. These applications are intended to serve real people living within a defined community.

On a technological point of view, the consequences of a failure with one member of this group would be confined to a region, which minimizes the overall network impact.

- 2 Then we have the true generic names like dot-sport, dot-family, dot-film or dot-home, etc., that meet a common need and will create new communities or groups to promote their cause.
- 3 Then come the trade names like Amazon, Orange, Toyota, Apple, Airbus or Allstate that will operate a public or private TLD.

We propose to follow this simple sequence in the allocation of new gTLDs to ensure compliance with ICANN's guidelines since its inception until today,

Some observers mentioned that the cITLDs and gTLDs applications requires more time to evaluate. We don't agree with that point of view since the same technology is proposed for many of the applications of the two first groups.

To better serve the Internet global community, enhance ICANN's image and keeping in mind that updates are made on a day-to-day basis on the global system, we propose the following: that ICANN immediately establish a batching process that will simply add TLDs to the root as the applications are accepted, in a daily, weekly, monthly process to be determined by ICANN. Such a process would help ICANN to promote the rise of the Internet for all.

Normand Fortier Président

PointQuébec Inc,