

Comment						Green = Accept, review with IRT Blue = discuss with IRT	Magenta = change to policy language Purple = change to implementation note Orange = add to FAQ	
No	Section	Comments	from	Category	Summary	Analysis	Resulting Change	IRT Comment
2-1	2	8. a. An implementation date of 1 February 2018 may not provide proper time for Registry Operators to prepare for new processes or integration with the INGO Claims System. However, the preferred approach is to leverage TMCH for Claims Services. Therefore, we recommend setting an implementation no earlier than 12 months from the approval of the specifications.	RySG	Policy implementation date	Recommend implementation date 12 months from approval of specifications	seeking explanation for 12 months? emailed IRT, need clarification on "approval of specification"	no change	12 months not required if the interface spec is like the TMCH ROs already have implemented. Provide clarification with the summary report. Provide the "spec" at the same time as the policy publication to maintain the 6 month duration.
3.1-1	3.1	Definitions 3.1. Reservation: The last sentence refers to "identifiers recorded on the Red Cross, IOC and IGO Identifier List", stating that it can be "found here." Obviously, this sentence is missing a link. IPC presumes it is meant to be the same link correctly mentioned in "4.1. Reservation."	IPC	request for a link	Last sentence missing a link	Add in missing link.	fix link	agreed
3.2-1	3.2, 3.3, 3.4, 3.5	3.2, 3.3, and 3.4 only generally refer to the "INGO Identifier List", while 3.5 seems to be tasked with identifying the "INGO Identifier List". 3.5 should provide greater clarity on: - who is responsible for creating and updating the said list, - what requirements are made for an organization to be identified on that list, - where the list can be found, and - who will review and approve submissions to the list and the underlying requirements for submission.	IPC	INGO Identifier list management	"INGO Identifier List". 3.5 should provide greater clarity on: - who, what and how	The policy recommendation requires that ECOSOC list be used for INGO. UNDESA is responsible for creating and updating the list following their own process. The source list can be found on their website.	no change to policy; perhaps add more explanation to FAQ and link to UNDESA	agreed
3.4-1	3.4	1. The Policy defines the term "INGO Claims System" as "a database of DNS labels corresponding to the INGO Identifier List" (Section 3.4, Definitions). This term is also used in the context of Section 5.2.7 (INGO Claims Service): "Upon Registration, the Registry Operator MUST provide a notification in the INGO Claims System that the name in the INGO Claims System has been registered [...]. From these two sections we conclude that the Registry Operator will need some kind of integration to communicate with the INGO Claims System. a. We note that the INGO Claims Notice (Appendix A) is different from the TMCH Claims System as defined in Section 3 of the Trademark Clearinghouse Rights Protection Mechanism Requirements? If such is the case, what is the rationale why the INGO Claims Notification cannot leverage TMCH? We would expect that using an existing system would be more efficient than integrating with a new one	RySG	Claims System Clarification	Registry Operator will need some kind of integration to communicate with the INGO Claims System.	INGO claims will use the same system as TMCH. Did not mention the word "TMCH" as we wanted to avoid any confusion that this policy had anything to do with Trademarks. we could explain within the Summary report.	no change	agreed
4.1-1	4.1	Section 4.1 (Reservation) of the Policy, states that "All gTLD Registry Operators MUST either withhold from registration or allocate to Registry Operator the second-level domain names corresponding to the DNS Label(s) [...]. a. We recommend that the Policy makes it explicit what registrar account Id the Registry Operator can use to allocate the domain names under this Policy. We suggest that it should be the Registry Operator Non-Billable account, or GURID 9999.	RySG	request for implementation detail	state registrar account Id the RO can use to allocate the domain names under this Policy (Non-Billable account, or Gurid 9999)	OK	Add to FAQ	agreed
4.1-2	4.1	Section 4.1 (Reservation) of the Policy, states that "All gTLD Registry Operators MUST either withhold from registration or allocate to Registry Operator the second-level domain names corresponding to the DNS Label(s) [...]. What does "unless otherwise specified" mean in the context of Section 4.1? If this refers to the exception specified in Section 4.2, then we recommend making the statement specific.	RySG	language clarification suggestion	Clarify "unless otherwise specified" in section 4.1	This was added to provide exceptions to any specific agreements RO may have with ICANN, agreed?	no change	agreed
4.2-1	4.2	The text in section 4.2 of the draft document should be made clearer, to ensure that both transfers AND renewals are permitted, i.e. the use of "or" vs "and" might be too ambiguous the way it's currently worded. I propose that you change the text from: "...MUST permit renewal or transfer of the domain name." to: "...MUST permit renewals of the domain name and MUST permit transfers of the domain name." Notice how my proposed wording is unambiguous, and has only one possible interpretation, namely that BOTH are permitted. Repetition of the "MUST permit" helps immensely, [conceivably a registry might interpret the current language to permit one but not the other!] I've also made the terms "renewals" and "transfers" be in the plural form (current language is singular), to ensure that multiple renewals and multiple transfers must be allowed.	GK	language clarification suggestion	Change 4.2 language to ""... MUST permit renewal or transfer of the domain name." to: "...MUST permit renewals of the domain name and MUST permit transfers of the domain name."	Suggested change meets the intended meaning. Therefore, adapt	4.2: from: "...MUST permit renewal or transfer of the domain name." to: "...MUST permit renewals of the domain name and MUST permit transfers of the domain name."	agreed
4.2-2	4.2	We recommend the following addition to Section 4.2: "Existing Registration in gTLDs: If a domain name, containing an exact match name from the Red Cross, IOC, and IGO Identifier List, is registered before the label is added to the Red Cross, IOC and IGO Identifier List, the Registry Operator MUST permit renewal or transfer of the domain name, subject to applicable Registry Operator's policies and restrictions. [...]"	RySG	renewal, transfer	additional language to Section 4.2 "subject to applicable Registry Operator's policies and restrictions."	Existing registrations are already subject to the Registry's applicable policies and restrictions. Accordingly, this language seems unnecessary, just explain it response.	no change	agreed
4.2-3	4.2	"If a domain name, containing an exact match name from the Red Cross, IOC, and IGO Identifier List, is registered before this Consensus Policy effective date or before the label is added to the Red Cross, IOC and IGO Identifier List, the Registry Operator MUST permit renewal or transfer of the domain name. If a domain name, containing an exact match name from the Red Cross, IOC and IGO Identifier List, is registered before the label is added to the Red Cross, IOC and IGO Identifier List, and is subsequently deleted, the Registry Operator MUST withhold the domain name from registration or allocate the domain name to Registry Operator", is therefore a decent "mid-way" proposal to solve the topic of how to deal with existing registrations in gTLDs. However, it could be argued that it would be more fair if good faith, non-infringing registrations by those with legitimate rights should be allowed at any time as a matter of course, possibly with review and non-objection by the Red Cross, IOC or IGO entity.	IPC	Change to exceptions procedure	Exceptions procedure: it would be more fair if good faith, non-infringing registrations by those with legitimate rights should be allowed at any time as a matter of course, possibly with review and non-objection by the Red Cross, IOC or IGO entity.	no change requested; current position is no change as this was not the initial interpretation of the policy; However, IRT would like to consider further. send an email to IRT to solicit broader input and then conclude next week		consider further.
4.3-1	4.3	The registrar or a third party needs to validate eligibility of the potential registrant.	RySG	validation of registrant		Ry & Rr has the flexibility to determine ways to comply to section 4.3	no change	agreed
4.3-1	4.3	4. Section 4.3 (Registration by Red Cross, IOC and IGO Organizations) requires Registry Operators "to provide a method for registration of the reserved names by Red Cross, IOC and IGO organizations". a. Registry Operators will not be able to guarantee that an applied-for domain name will be available for registration, therefore we recommend additional language in footnote "2" to read: "Registrations in the TLD remain subject to availability and to Registry Operator's applicable registry policies and registration restrictions, including community-based eligibility requirements, Public Interest Commitments and IDN Tables".	RySG	Additional Language	Recommend additional language in footnote "2"	requested additional language does not seem to change the policy. therefore, should accept.	add to footnote	agreed
4.3-2	4.3	b. We highly recommend making it explicit that Registry Operators do not have the obligation to validate eligibility of the potential registrant or any related liability.	RySG	validation of registrant	making it explicit that RO do not have the obligation to validate eligibility of the potential registrant or any related liability.	Ry & Rr has the flexibility to determine ways to comply to section 4.3	no change	agreed
4.3-3	4.3	c. The potential Registrant must use an ICANN accredited registrar.	RySG	accredited registrar	Registrant must use an ICANN accredited registrar	RA requires use of accredited registrar also. So we'll accept this suggestion.	no change	agreed

4.4-1	4.4	"4.4. Red Cross, IOC and IGO Identifier List Changes: Names may be added to or deleted from the Red Cross, IOC and IGO Identifier List upon ten (10) calendar days notice from ICANN to Registry Operator. ICANN will consult with the GAC in relation to proposed changes to the names on the Red Cross, IOC and IGO Identifier List." In particular, these organizations may in the future attempt to rename themselves into their shorter acronyms (eliminating any reference to their longer names), to gain protections that were explicitly NOT obtained via the GNSO Consensus policy. Furthermore, other organizations might be added that aren't "real" IGOs (the US government has disputed whether all entities that have made Article 6ter notifications are real IGOs, for example, in their comments to the IGO Curative Rights PDP; thus, it's open to debate whether there is a broad consensus about the status of future organizations that purport to be IGOs that seek to be on the list). This Draft section 4.4 should be amended such that any additions to the list go through a more rigorous and public consultation, including a public comment period (in conjunction with the GNSO too), not just consultation with the GAC. That public comment period could then ensure that shorter domain names that have multiple competing uses (e.g. generic dictionary words, acronyms, etc.) are not added to the list.	GK	List change process	Suggests section 4.4 attempted to include a public comment (in conjunction with the GNSO AND GAC) to ensure shorter domain names with competing uses are not added to the list.	The initial list of IGO came from GAC which was adapted as is by the GNSO and Board. Stay consistent with that process. There are Curative Rights protection available in case of abuse. Also, acronyms are not allowed per the current policy. Must make it clear that the changes come from the GAC. explain in the summary report	no change	agreed
4.4-2	4.4	5. Section 4.4 (Red Cross, IOC and IGO Identifier List Changes) states that ICANN will notify Registry Operators of any change in the list. a. We recommend ICANN to make the list available through a machine-readable file that Registry Operators can process.	RySG	List Format	machine-readable file for name list that Registry Operators can process	agree to provide machine-readable file	Add an implementation note	agreed
4.4-3	4.4	b. Ten calendar days may not be adequate time for Registry Operators to process changes or updates of the list.	RySG	notification of change	RO requests more than 10 days notice for list change	10 days is consistent with the existing RA requirements and has not been an issue so no reason to make this different. reference the contractual requirement already in place in the summary report [1]	no change	agreed
4.4-4	4.4	c. To expedite the process of any changes to the list, we recommend that the notification to Registry Operators is broken down into at least two parts or that its data fields denote: i) DNS labels added to the list, ii) DNS labels removed from the list.	RySG	Expedite changes to list	Break down notification of changes in list into two parts	This is notification format request and should be doable. TS will provide the diff info.	Add an implementation note	agreed
4.4-4	4.4	3. Updates to IGO Identifier List. The BC supports using the IGO names list provided by the GAC, which currently contains one language and allows for adding a second language when available, to create the initial list of the DNS Labels as required by the policy recommendation.	BC	IGO Identifier List	BC supports using the IGO names list provided by the GAC	acknowledge the support, no further action required	no change	agreed
4.4-5	4.4	Regarding Changes to identifiers for Red Cross, IOC and IGOs, the BC supports permitting Names to be added to or deleted from the Identifier List upon ten (10) calendar days' notice from ICANN to the Registry Operator. However, the BC believes that ICANN should consult with both the GNSO and the GAC in relation to any proposed changes to the names on the Red Cross, IOC and IGO Identifier List so that the GNSO has the ability to assure that such Name changes are consistent with the underlying policy.	BC	Changes to identifiers for Red Cross, IOC and IGOs	BC believes that ICANN should consult with both the GNSO and the GAC in relation to any proposed changes to the names on the Red Cross, IOC and IGO Identifier List so that the GNSO has the ability to assure that such Name changes are consistent with the underlying policy.	Will consult with GAC only. the original list came from GAC which the GNSO approved. the implementation plan follows the recommendation. For our IRT scope, it should be limited to maintenance only.	add three beautiful words: maintain, upkeep and ensure accuracy	agreed
4.4-6	4.4	Although IPC agrees on the importance of protecting Red Cross entities, IOC entities and IGOs from misuse and false registrations of their names, there may also be examples of good faith registrations of domain names that are an exact match.	IPC	Red Cross, IOC and IGO Full Name Reservation at the Second-Level	IPC agrees on importance of protecting Red Cross entities, however sees possibility of good faith registrations of domain names that are an exact match.	This note appears to be out of scope of the Working Group's policy recommendations and implementation guidance. See, e.g. "For clarification purposes, second-level names matching a protected identifier, as identified via any consensus policies defined here, and that are not registered within an existing gTLD, shall be immediately reserved from registration in the same manner as for new gTLDs." (p. 25 - Final Report)	no change	agreed
5.1-1	5.1	In draft section 5.1, the list of organizations in the list at: https://community.icann.org/display/IIPIRT/INGO+Identifier+List+-+Draft+Page+for+IRT+Use+Only includes generic terms such as "Rare" and "Mosaic" that can be used by many organizations or individuals. Furthermore, those INGOs may not have matching registered trademarks in many cases, which list the specific goods and/or services and geographic regions to which the trademarks would apply. Thus, I'm very concerned that any claims notice (in 5.2) will have a chilling effect, because the prospective registrant is not being provided sufficient details with which to make an informed decision as to whether their prospective use of the domain name would cause a real conflict with the INGO. Thus, either the claims notice should be scrapped in its entirety, or the list of organizations in the above link needs to be supplemented with additional columns to (a) identify the countries where those INGOs purport to operate and (b) identify what those INGOs actually do/ (i.e. the goods/services that might cause a conflict). The text of Appendix A doesn't provide these details, either (it just provides various contact details for the INGO). Appendix A doesn't provide any details regarding how the INGOs use their purported protected names. In other words, there's a lot of work left to be done with respect to the claims notices and right now it's not even close to being ready for implementation, until those columns (and the relevant changes to Appendix A) are added.	GK	Claims Notices	Generic terms used by many organizations may not have matching trademarks to geographic region and goods. Claims notices are not gathering enough detailed information to properly identify the country, goods, services that INGOs claim to do. This lack of detail prevents claims notices being ready for implementation at this point. Delay or scrap implementation of claims notices.	This policy is not for trademark. The policy recommendation requires use of the INGO list provided by ECOSOC.	no change	agreed
5.1-2	5.1	d. The list of names enclosed in the notification MUST be in machine-readable format, exact matches only.	RySG	List Format	machine-readable format, exact matches only	for IGO yes, for INGO no need. claims system same as TMCH	Add implementation note 3.	agreed
5.2-3	5.2	2. INGO Claims Notification. The BC supports the proposed language2 that will be sent to a potential registrant if the potential registrant attempts to register a domain name that is an exact match of the DNS Label on the INGO Identifier List.	BC	INGO Claims Notification	BC supports the proposed language2	acknowledge the support, no further action required	no change	agreed
5.2-4	5.2	IPC notes, and accept, the similarities with the proposed INGO Claims Services and the current "Claims Period" of the Trademark Clearinghouse.	IPC	INGO Claims Services at the Second-Level	IPC notes similarities of proposed INGO Claims Services with Trademark Clearinghouse	acknowledge the support, no further action required	no change	agreed
5.2.1-1	5.2.1	Referring to these similarities, IPC would like to note that it may be necessary to review the proposed INGO Claims Service period if the Claims Period related to the Trademark Clearinghouse is changed, a topic that is right dealt with by the separate Review of all Rights Protection Mechanisms (RPMs) in all gTLDs PDP Working Group.	IPC	INGO Claims Services at the Second-Level	it may be necessary to review the proposed INGO Claims Service period if the Claims Period related to the Trademark Clearinghouse is changed	there is no change requested with this comment. the claims period is a requirement by the policy recommendation. changes to the period would be equivalent to the policy change and would require the PDP process.	no change	agreed

5.3-1	5.3	Draft section 5.3 is open to the same kind of gaming I identified in my point #2 above. ICANN should consult with the GNSO "and" the public before adding additional names to the list, to ensure that shorter domain names that have multiple competing uses (e.g. generic dictionary words, acronyms, etc.) are not added to the list.	GK	List change process	Concern: unverified orgs rename themselves into shorter acronyms to gain protections. Suggests section 5.3 amended to include a public comment	The policy recommendation requires use of the INGO list provided by ECOSOC. UNDESA evaluates and approves the new INGO that are added to the ECOSOC list.	no change	agreed
5.3-2	5.3	a. The comments made on Section 4.4 (see above) also apply on Section 5.3.	RySG	notification of change	RO requests more than 10 days notice for list change	10 days is consistent with the existing RA requirements and has not been an issue so no reason to make this different. [2]	no change	agreed
Ap-1	Appendix A & B	IPC supports the proposed "INGO Claims Notification displayed to Potential Domain Name Registrant", and "INGO Notice of Registered Name sent to Protected Organization", as they are clear and identify the topic, risks and possibilities for both parties.	IPC	Appendix A and B	IPC supports the proposed "INGO Claims Notification..	acknowledge the support, no further action required	no change	agreed
IN-1	Implementation Note 1	a. We generally support the conversion rules as explained in section 1.1. However, we want to raise that a valid U-Label or A-Label will be subject to Registry Operator's IDN Table rules , which may make the DNS Label ineligible for registration in that specific TLD. For example, a Cyrillic DNS Label will be ineligible for registration in a TLD that does not support Cyrillic domain names at the second level, or a DNS Label may be ineligible for registration because the Registry's TLD IDN Table does not support a certain code point or code point sequence in the DNS Label.	RySG	DNS Label Conversion rules.	valid U-Label or A-Label will be subject to Registry Operator's IDN Table rules, which may make the DNS Label ineligible for registration in that specific TLD.	OK [3]	no change	agreed
IN-2	Implementation Note 1	c. In all cases, the DNS Labels should be in machine-readable format.	RySG	DNS label format	DNS label format should be machine readable	for Red Cross, IOC and IGO yes, for INGO no need.	Add implementation note (3)	agreed
IN-3	Implementation Note 1	1. DNS Label Conversion Rules. The BC supports the recommended DNS Label Conversion Rules which defines how protected identifiers on the protection list that do not conform to the framework of DNS permissible characters will be converted to DNS permissible equivalent characters (letters, digits and hyphens).	BC	DNS Label Conversion Rules	BC supports DNS Label conversion rules	acknowledge the support, no further action required	no change	agreed
G-1	General	How do the Registry Operators' and registrars' obligations under this policy dovetail with the New gTLD Registry Agreement Section 2.6, Spec 5, and the RPMs for new gTLDs (e.g., are the reserved labels under this policy subject to Sunrise and/or Claims Services upon release, a la Section 2.4.3 of the RPMs)?	RySG	Clarification Policy	How would obligations under this policies work together with RA and RPM?	This is a question only. No suggestion here. This policy is in addition to the RA requirement (does not supersede) [4]	add to explanation to FAQ	agreed
G-2	General	DNS Labels for IDNs should be in its ASCII Compatible Encoding form.	RySG	IDNs ASCII compatible	provide IDNs in ASCII	already done	no change	agreed
G-3	General	b. In cases of IDN variants, each IDN variant should be listed as a single entry in each one of the Identifier Lists.	RySG	IDN Variants	IDN variants should be listed as a single entry in each identifier list	agreed and there isn't any change to the policy language, is there? We may want to consider providing instructions to the entity providing the list, specifically around IDN variants, and including a response indicating this in the report of public comments.	no change	agreed

[1] RA spec 5: Additional names (including their IDN variants) may be added to the list upon ten (10) calendar days notice from ICANN to Registry Operator.

[2] RA spec 5: Additional names (including their IDN variants) may be added to the list upon ten (10) calendar days notice from ICANN to Registry Operator.

[3] Exhibit A:

Approved Services:

The ICANN gTLD Applicant Guidebook (located at <http://newgtlds.icann.org/en/applicants/agb>) and the RSEP specify processes for consideration of proposed registry services. Registry Operator may provide any service that is required by the terms of this Agreement. In addition, the following services (if any) are specifically identified as having been approved by ICANN prior to the effective date of the Agreement, and Registry Operator may provide such services:

[4] RA 2.6: Reserved Names. Except to the extent that ICANN otherwise expressly authorizes in writing, Registry Operator shall comply with the requirements set forth in Specification 5 attached hereto ("Specification 5"). Registry Operator may at any time establish or modify policies concerning Registry Operator's ability to reserve (i.e., withhold from registration or allocate to Registry Operator, but not register to third parties, delegate, use, activate in the DNS or otherwise make available) or block additional character strings within the TLD at its discretion. Except as specified in Specification 5, if Registry Operator is the registrant for any domain names in the registry TLD, such registrations must be through an ICANN accredited registrar, and will be considered Transactions (as defined in Section 6.1) for purposes of calculating the Registry-level transaction fee to be paid to ICANN by Registry Operator pursuant to Section 6.1.