

ALAC Procedure for Filing Comments and Objections in the Next Round

Introduction

In the ICANN New gTLD Program Next Round (targeted for launch in April 2026) (Next Round), ICANN funding is available for the At-Large Advisory Committee (ALAC) to file objections to gTLD applications.

Under Section [xxx] “Objection Filing Fees” on page [xx] of the Next Round New gTLD Applicant Guidebook (AGB):

“Funding from ICANN for objection filing fees, as well as for advance payment of costs...is available to the At-Large Advisory Committee (ALAC). Funding for ALAC objection filing and dispute resolution fees is contingent on publication by ALAC of its approved process for considering and making objections. At a minimum, the process for objecting to a gTLD application will require:

- *bottom-up development of potential objections,*
- *discussion and approval of objections at the Regional At-Large Organization (RALO) level, and*
- *a process for consideration and approval of the objection by the At-Large Advisory Committee.”*

ALAC can file objections on two grounds:

- Community Objection – There is substantial opposition to the gTLD application from a significant portion of the community to which the gTLD string may be explicitly or implicitly targeted.
- Limited Public Interest Objection – The applied-for gTLD string is contrary to generally accepted legal norms of morality and public order that are recognized under principles of international law.

[The ALAC Objections Small Team](#) (in particular its Process Workflow Subteam) was tasked to review the previous procedure for the ALAC to submit public comments on, and file objections to new gTLD applications for the 2012 Round of New gTLD Applications (the 2012 Round Procedure). The objective of this review was to introduce improvements to the 2012 Round Procedure, by taking into consideration lessons learnt from having utilized the same.

As a result of this review, the Procedure for the ALAC to submit public comments on, and to file objections to new gTLD applications in the Next Round (the Next Round Procedure) would facilitate:

- As a priority, the consideration and preparation, for submission, of comments to new gTLD applications during the [xx] day Application Comment Period (ACP); and
- The consideration of the need to escalate comments into, or initiate, Objections during the [xx] Objection Period.

Thus, the Next Round Procedure, as follows, outlines how the ALAC would undertake the submission of public comments to gTLD applications during the ACP and to file objections to gTLD Applications during the Objection Period.

Overview / Summary

Pre-Launch Preparation

At least three months before the New gTLD Program launch, the ALAC and At-Large will work to ensure that all members understand the process and criteria for filing objections on community or limited public interest grounds. This will be discussed in ALAC, RALO and Consolidated Policy Working Group (CPWG) calls, with multilingual documents shared across At-Large.

Formation of the At-Large gTLD Applications Review Group (gARG)

Once informed, At-Large members from all RALOs will be invited to join the At-Large gTLD Applications Review Group (gARG). Members will:

- Help review gTLD applications and identify those raising community or limited public interest concerns (“Identified Applications”);
- Discuss concerns at RALOs, CPWG, ALAC or special calls for RALOs’ feedback .
- Draft comments on Identified Applications for ALAC submission. The gARG may seek advice from subject matter experts and/or legal experts for such drafting;
- Monitor responses to ALAC comments and recommend whether to escalate to a formal objection
- Draft ALAC objection statements, when necessary.

gARG Membership Requirements

Members should include those with legal expertise, strong English skills, and must not have any actual or perceived conflicts of interest.

Examples of conflicts of interest include, but are not limited to:

- being a member of an At-Large Structure that is publicly promoting or supporting a gTLD application,
- having financial interest in an applicant that has applied for a gTLD string,
- employed by, or having a family member employed by, any applicant that has applied for a gTLD string.

- Providing any services (legal or technical) to any applicant that has applied for a gTLD string.
- Having a close family relationship (e.g. spouse, partner, sibling, parent, child) with an individual who has a financial or employment interest in an applicant that has applied for a gTLD string.

Each RALO will be represented in the gARG. It is expected the gARG will be composed of 12 to 15 members from the RALOs.

The gARG must be formed no less than one week before ICANN publishes the list of gTLD applications.

Review and Comment Process:

After the gTLD applications are revealed, gARG, RALOs and the CPWG will review and discuss applications raising concerns on community or limited public interest grounds. Such discussions would be guided by a set of questions that needs to be answered or scored which could satisfy the criterion for community or limited public interest grounds.

If a gARG member has a conflict of interest with a specific gTLD application (for example the application impacts an industry the member is involved in), they must recuse themselves from discussions and drafting related to that application.

Drafting and Submission of Comments

Once there is consensus that the gTLD poses a legitimate concern, the gARG drafts the initial comment in close consultation with all RALOs and the affected community. The first draft of the comment is shared with the RALOs, ALAC and CPWG for feedback.

Once finalized, the ALAC will vote on whether to submit the comment through the Application Comment System. Comments should normally be submitted within four months of the application announcement, leaving three months to consider formal objections (assuming the objection period remains at [7 months] from the applications announcement).

Objection Filing

Two months before the objection filing deadline, the ALAC in consultation with the RALOs will decide whether to draft formal objections or not. If so, penholders from the gARG will prepare objection statements. The ALAC and RALOs may hold briefing calls. If 3 or more RALOs approve an objection, the ALAC will vote on whether to file the objection.

If the ALAC votes in favor of filing an objection, ICANN is notified, and ALAC coordinates with ICANN to pay the objection filing fees. The gARG pen holders will assist in responding to any correspondence related to the objection

Annex A: ALAC/At-Large Procedure for Filing Comments and Objections Flowchart

