



**International Chamber of Commerce**

*The world business organization*

## **Policy and Business Practices**

# **ICC Task Force on Internet and Telecom Infrastructure and Services (ITIS) Chair and Vice Chair's Informal comments on Draft Expressions of Interest/Pre-Registrations Model (EoI)**

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ICC, the International Chamber of Commerce, is a global business membership organization, with companies and associations from the supply and buy sides, across sectors and geographies, and of all sizes. As the Chair and Vice Chair of ICC's Task Force on Internet and Telecoms Infrastructure and Services (ITIS) we appreciate the opportunity to provide informal comments on the proposed Draft Expressions of Interest/Pre-Registrations Model. Our members all rely on the Internet for many facets of their operations, communications, and distribution channels, thus the technical coordination of the Internet is of critical importance to them.

ICC members place significant importance on both the "Affirmation reviews" and the "EoI". We have managed to develop consensus informal comments on the "Affirmation reviews" which will be submitted by the deadline. Given the simultaneous comment periods for these two important topics, the end of year holidays, and the need to respect ICC's internal consensus building processes, we regret that we cannot submit complete and consensus built input on this important topic of the EoI. In this context, we submit the following points for consideration:

- The draft Expression of Interest (EoI) proposal has interesting elements. However, ICC does not support the implementation of any EoI until the rules for the new gTLD application process are at least fully developed and agreed upon by the ICANN community.
- An EoI is not a substitute for an independent economic analysis on the demand for new gTLDs, which was requested by the Board in October 2006 to be conducted prior to the launch of an EoI and the first application round for new gTLDs.<sup>1</sup> We request that this study be conducted.
- It is very difficult for business to evaluate participating in an EoI when new or changed gTLD application rules could significantly impact business plans and models. There are still several important issues that remain unresolved in the current Draft Applicant Guidebook (DAG), and it is not certain they will be resolved by DAG4.
- We believe the EoI proposal should be discussed more fully and publicly with the ICANN community at the next ICANN meeting in Nairobi and would be concerned if the EoI proposal is meant to be decided by the ICANN Board in February. We recommend that a dedicated and comprehensive discussion take place at the next ICANN meeting in Nairobi before any final decision is taken on this matter.

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<sup>1</sup> ICANN Board request on economic study available at <http://www.icann.org/en/minutes/minutes-18oct06.htm>

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We appreciate the opportunity to provide these informal comments in our leadership capacities for ICC's relevant task force and look forward to contributing to the continued discussion related to new gTLDs.

*Gordon Moir, Chair, ICC's Task Force on Internet and Telecoms Infrastructure and Services (ITIS)*

*David Appasamy, Vice Chair, ICC's ITIS Task Force*

## The International Chamber of Commerce (ICC)

The International Chamber of Commerce is the largest, most representative business organization in the world. Its hundreds of thousands of member companies in over 120 countries have interests spanning every sector of private enterprise.

A world network of national committees keeps the ICC International Secretariat in Paris informed about national and regional business priorities. More than 2,000 experts drawn from ICC's member companies feed their knowledge and experience into crafting the ICC stance on specific business issues.

The United Nations, the World Trade Organization, and many other intergovernmental bodies, both international and regional, are kept in touch with the views of international business through ICC.

For more information please visit: [www.iccwbo.org](http://www.iccwbo.org)

## ICC Commission on E-Business, IT and Telecoms (EBITT)

Business leaders and experts drawn from the ICC membership establish the key business positions, policies and practices on e-business, information technologies and telecommunications through the EBITT Commission. With members who are users and providers of information technology and electronic services from both developed and developing countries, ICC provides the ideal platform to develop global voluntary rules and best practices for these areas. Dedicated to the expansion of cross-border trade, ICC champions liberalization of telecoms and development of infrastructures that support global online trade. ICC has also led and coordinated the input of business around the world to the World Summit on the Information Society, Geneva 2003, Tunis 2005, and continues this effort in the activities established in the Tunis Agenda through its initiative, Business Action to Support the Information Society (BASIS <http://www.iccwbo.org/basis>)