
Public Comment Summary Report

Proposed Next Round Base gTLD Registry Agreement-Public Comment 1 of 2

Open for Submissions Date:

Wednesday, 04 June 2025

Closed for Submissions Date:

Monday, 21 July 2025

Summary Report Due Date:

Thursday, 28 August 2025 (extended from Monday, 04 August 2025)

Category: Policy

Requester: ICANN org

ICANN org Contact(s): globalsupport@icann.org

Open Proceeding Link: <https://www.icann.org/en/public-comment/proceeding/proposed-next-round-base-gtld-registry-agreement-public-comment-1-of-2-04-06-2025>

Outcome:

In total, 12 Public Comments were submitted by stakeholders from across the community on the first of two Public Comment proceedings on the proposed Next Round Base gTLD Registry Agreement (Next Round RA). One of 12 comments from the Registrar Stakeholder Group (RrSG) came through ICANN Global Support.

Commenters considered whether the proposed language was consistent with the Final Report on the New gTLD Subsequent Procedures (SubPro) Policy Development Process (Final Report) outputs.

Commenters also evaluated whether the changes related to policy in the proposed Next Round RA appropriately implemented the recommendations and intent of the following ICANN Consensus Policies:

- Registration Data Policy
- Protection of IGO and INGO Identifiers in All gTLDs Policy
- Phase 1 Final Report on the Internationalized Domain Names Expedited Policy Development Process
- Phase 1 Final Report on the Review of All Rights Protection Mechanisms (RPMs)

Additionally, commenters provided feedback on the operational updates in the proposed Next Round RA that intend to allow for changes to current processes and to create efficiencies within ICANN and for Registry Operators.

All Public Comments received were reviewed and carefully considered by ICANN org. Any substantive changes required to the proposed Next Round RA that impact the SubPro Policy Recommendations will be reviewed with the SubPro Implementation Review Team (IRT).

Section 1: What We Received Input On

As part of the New gTLD Program: Next Round, ICANN is preparing the Next Round Base gTLD Registry Agreement (Next Round RA), outlining the rights and obligations of new gTLD Registry Operators. Once the ICANN Board approves the final terms of the Next Round RA, it will serve as the contractual document between successful applicants in the New gTLD Program: Next Round and ICANN. Note: This draft is not final and is subject to ICANN Board consideration and approval. ICANN opened its first Public Comment proceeding on the Next Round RA to seek input from the community, including potential Next Round applicants.

Consistent with the outputs of the Final Report, the Next Round RA is based on the revised Base gTLD RA (approved by the ICANN Board 21 January 2024). It incorporates changes from Board-approved policy recommendations and includes other operational updates based on ICANN's experience since launching the 2012 Round of the New gTLD Program.

The Guided Submission form asked if the changes related to policy in the proposed Next Round RA appropriately incorporate the recommendations and intent of the following:

- **Final Report** - The policy recommendations for future rounds of gTLD applications following the 2012 Round, as developed by the Generic Names Supporting Organization (GNSO).
- **ICANN Consensus Policies**
 - **Registration Data Policy** - governs how domain name registration data is collected, maintained, and disclosed.
 - **Protection of IGO and INGO Identifiers in All gTLDs Policy** - protects the names and acronyms of IGOs and INGOs.
 - **Phase 1 Final Report on the Internationalized Domain Names Expedited Policy Development Process** - introduces variant gTLDs.
 - **Phase 1 Final Report on the Review of All Rights Protection Mechanisms (RPMs)** - recommendations that update the Uniform Rapid Suspension System (URS), the Trademark Clearinghouse (TMCH), the Sunrise and Trademark Claims services offered through the TMCH, and the Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP).

The Guided Submission form also asked if there was any community feedback on the changes related to operational updates.

This first Public Comment proceeding was intended to gather feedback on substantive elements of the Next Round RA and the community was encouraged to provide its input during this first proceeding to allow more time for consideration. The second Public Comment proceeding, expected to be in September 2025, is intended for incremental changes to the Next Round RA, including those resulting from the feedback provided in the first Public Comment proceeding, as applicable and appropriate.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
Non-Commercial Stakeholder Group	Mesumbe Tomslin Samme-Nlar	NCSG
At-Large Advisory Committee	Policy staff in support of the At-Large Community	ALAC
Registries Stakeholder Group	N/A	RySG
Intellectual Property Constituency	Margaret Milam	IPC
Registrar Stakeholder Group	Owen Smigelski	RrSG

Individuals:

Name	Affiliation (if provided)	Initials
Mahmond Nabil	N/A	MN
Doreen Khamala	N/A	DK
Nitin Walia	N/A	NW
Benson Mugure	N/A	BM
Wen-Fong Tsen	Ministry of Digital Affairs	WT
Shweta Asher	Radix Technologies Inc SEZC	SA
Reg Levy	Tucows Domains	RL

Section 3: Summary and Analysis of Submissions

ICANN appreciates the time, dedication, and participation in this proceeding and is grateful to those who provided timely feedback. Overall, the comments indicate that the proposed Next Round RA generally reflects the SubPro Recommendations and Consensus Policy Recommendations in a fair and accurate manner. However, some comments suggest there is a need for clearer distinction between what belongs in the Next Round RA, what should serve as guidance in the Applicant Guidebook (AGB), and what should apply during the contracting phase or post-contracting phase. In some instances, commenters noted that the proposed language does not align fully with the recommendations. A summary of all comments is provided below.

To enhance readability, ICANN has organized this report by including a summary of the comments received, followed by ICANN's corresponding analysis. The structure mirrors that of the Public Comment proceeding and is organized by question and topic (e.g., Q1; SubPro Recommendations, Topic 36: 1a. Registry Agreement). For broader areas such as Q1, Topic 1a, Base Registry Agreement, the summaries are further grouped by specific subject areas identified by commenters.

Topic 36: Base Registry Agreement

Q1a. Does the proposed Next Round RA meet the intent of the policy recommendations and topics in the following sections of the SubPro Final Report regarding Topic 36: Base Registry Agreement?

Overall Comment Summary

Comments indicate that the proposed Next Round RA is generally consistent with the relevant policy recommendations, though input may still be provided on sections currently under discussion. Other feedback expressed appreciation for the extensive effort involved in updating the agreement and noted no substantive concerns. Further, comments noted that the proposed Next Round RA supports the principle of ensuring ongoing compliance with Consensus Policies and reflects the guideline calling for a stable and consistent approach to registry fees.

Specific topic areas addressed by commenters:

I. Recommendation 36.3 - Exemption Process

Comment Summary:

Comments emphasize that the proposed Next Round RA does not provide clear or well-defined procedures for requesting or negotiating exemptions. They note the absence of transparency measures such as public notice, rationale, and a review mechanism, and stress that the SubPro Final Report intended a clearer, more structured, and efficient process.

Analysis:

Recommendation 36.3 is specific to the TLD string application process, not the Next Round RA. The draft [Applicant Guide Book](#) (AGB) Section 1.2.15 Contracting describes the process applicants can use to seek exemptions to certain provisions of the Next Round RA in extraordinary circumstances. Some application types may be considered exempt from certain provisions while others may be required to include specialized provisions in their registry agreement (e.g., Code of Conduct Exemption for a .BRAND TLD) as outlined in Section 6.4 of the AGB.

II. Recommendation 36.4 - Fraudulent and Deceptive Practices

Comment Summary:

Several comments raise concerns that the proposed Next Round RA does not adequately implement Recommendation 36.4. Specifically, they indicated the draft lacks a clear contractual covenant prohibiting fraudulent or deceptive practices and does not outline enforcement mechanisms such as breach notices, cure periods, or potential termination. The current approach, linking the provision to “Critical Functions” in Specification 10, is viewed as misaligned with the intent of the recommendation because “Critical Functions” is undefined and primarily relates to service performance specifications rather than overall registry operations. Commenters suggest that the prohibition should apply broadly to the operation of the registry and provision of registry services, with some recommending that findings of fraud or deceptive practices through a Public Interest Commitments Dispute Resolution Process (PICDRP) determination should be grounds for contract termination.

Analysis:

The proposed language prohibiting fraudulent or deceptive practices in the Next Round RA was bracketed with a footnote denoting that it was still under consideration with the SubPro IRT. Updated language will be published in the Next Round RA redline for the second Public Comment proceeding.

III. Universal Acceptance

Comment Summary:

Comments note that while the proposed Next Round RA reflects many policy outputs and is a solid foundation, it does not fully meet the intent of Topic 36 in regards to Universal Acceptance (UA). In particular, commenters raised concerns that Section 1.2 places sole responsibility for UA on registry operators, contrary to SubPro’s emphasis on shared accountability. Suggestions include explicitly recognizing ICANN’s role in supporting UA adoption by providing resources, fostering ecosystem readiness, and integrating UA compliance into pre-delegation testing. Additional recommendations call for clearer, more predictable procedures, stronger support for multilingual and script-diverse TLDs, and balanced contractual flexibility to encourage innovation.

Analysis:

The Working Group’s final outputs under the SubPro policy emphasize continued awareness of the challenges of UA and reaffirm the 2012 implementation approach:

- **Affirmation 11.2** confirms that UA-related provisions in the 2012 round—specifically, Section 1.2.4 of the Applicant Guidebook (“Notice concerning Technical Acceptance Issues with New gTLDs”) and clause 1.2 of the Registry Agreement (“Technical Feasibility of String”)—remain applicable.
- **Recommendation 11.3** states that applicants should be made aware of UA challenges and must be provided access to current and future UA resources maintained by ICANN, including those from the Universal Acceptance Steering Group (UASG).

Accordingly, the Next Round RA remains focused on ensuring that applicants are notified of potential UA-related issues, as reflected in the inclusion of the “Technical Feasibility of String” clause in Section 1.2 of the Next Round RA. This clause aligns with the policy’s intended scope for the RA and fulfills the requirement to provide notice.

Beyond the Next Round RA, ICANN org remains committed to promoting UA across the Internet ecosystem. This commitment is embedded in:

- The FY26–30 Strategic Plan, Objective 3.1: Facilitate Digital Inclusion;
- The FY26 Organizational Objectives, specifically Objective 10: Digital Inclusion; and
- Ongoing implementation efforts led by ICANN’s IDN and UA Programs team, which support multiple initiatives to advance UA.

To strengthen this commitment, ICANN recently launched the Universal Acceptance Expert Working Group, which will develop guidelines for ICANN org to consider in its implementation work on UA adoption, and help ensure consistent progress toward UA-readiness. ICANN also continues to publish regular updates on UA progress, including during ICANN meetings and through the annual UA Readiness Report for applicants.

While the Next Round RA reflects the appropriate contractual scope as directed by SubPro, ICANN org acknowledges the importance of achieving UA and remains dedicated to supporting the broader ecosystem's readiness through policy, technical guidance, and stakeholder engagement.

IV. Contractual Flexibility for Future Rounds

Comment Summary:

Comments stress the need for contractual flexibility to accommodate future rounds and innovation. While the proposed Next Round RA acknowledges the importance of evolution, it should more clearly commit to a transparent process for revising or versioning the agreement, particularly for non-standard or innovation-driven TLDs.

Analysis:

ICANN believes the Next Round RA includes the appropriate mechanisms to allow for evolution of the registry agreement, when appropriate, through the global amendment process as set out in Sections 7.6 (Amendments and Waivers) and 7.7 (Negotiation Process). Additionally, the Registry Services Evaluation Policy is another mechanism that is available and provides for opportunities for innovation for registry operators (once an applicant has executed the RA) in accordance with such Policy.

V. Predictability

Comment Summary:

The proposed Next Round RA is recognized as a strong foundation, but concerns remain that ICANN's discretionary authority could undermine the predictability framework envisioned by SubPro. To fully align with Topic 36, the agreement should more explicitly incorporate shared accountability on UA and IDNs, clear and predictable procedures, stronger support for multilingual and script-diverse TLDs, and balanced flexibility to foster innovation.

Analysis:

ICANN believes the Next Round RA includes the appropriate clarity and transparency of its contractual obligations. ICANN is committed to enabling the success of UA and IDNs. However, ICANN seeks further clarity on the commenter's reference to "shared accountability." If this refers to additional contractual requirements related to UA or IDN obligations, ICANN notes that such obligations may be more appropriately addressed through policy development or community-supported implementation guidance, rather than through the registry agreement alone.

VI. Centralized Zone Data Service

Comment Summary:

One commenter emphasized the importance of the Centralized Zone Data Service (CZDS) for DNS security, brand protection, and public oversight. They recommend that zone file access be granted automatically through CZDS rather than requiring registry operator approval, noting this would streamline processes, better serve the security community, and align with the intended purpose of the service. While provisions to prevent abuse are appropriate, the main concerns raised relate to restrictive practices by registry operators.

Analysis:

ICANN notes that the system currently in place allows a registry operator to make zone file access available automatically. Therefore, no changes to the Next Round RA are currently contemplated.

Topic 36: Base Registry Agreement Implementation Guidance 17.2 and 17.17 (Application Support Program)

1b. Does the proposed Next Round RA meet the intent of the policy Recommendations and Topics of the Applicant Support Program?

Comment Summary:

Comments highlight that the draft Next Round RA does not fully implement the Applicant Support Program (ASP) recommendations. While financial support through reduced application fees is included, there is no provision for non-financial assistance such as mentorship, legal guidance, or technical support, which are central to the intent of the program. The Next Round RA also lacks contractual protections to ensure ASP recipients retain eligibility through delegation and operation, leaving them vulnerable to premature disqualification or exploitation. Several provisions, including pricing and fee obligations, could disproportionately burden smaller or ASP-backed registries, and proposed tiered fee reductions may be insufficient. Additional clarity is requested regarding eligibility determination, consequences of non-compliance, and voluntary relinquishment of ASP status, as well as mechanisms to provide transitional or operational support post-delegation.

Analysis:

In response to comments on Recommendation 17.2—specifically regarding support beyond the application fee and additional concerns about ASP-related fees—the ICANN Board did not adopt the original SubPro Policy Recommendation. Instead, the GNSO Council submitted a revised version (see June 2024 Scorecard: [Subsequent Procedures Supplemental Recommendations](#)), which the ICANN Board adopted in July 2024. The updated Recommendation 17.2 emphasizes the importance of capacity development throughout the application and registry operator lifecycle, extending beyond fee reductions. In line with this, the ASP team is developing capacity-building resources to support applicants throughout their journey. The Next Round RA reflects fee reductions only as recommended by the GNSO Council and adopted by the ICANN Board.

Furthermore, ICANN has recruited, and continues to seek, pro bono (volunteer) professional service providers and mentors interested in offering their expertise to applicants that receive assistance as part of the ASP. A list of available providers can be found on the [Next Round ASP Resources web](#)page. As for capacity development support for ASP applicants who become registry operators, this is still being developed and is not expected to be a contractual obligation.

To address additional comments requesting that fee reductions for registry operators approved through the ASP should be higher or more impactful, the Next Round RA includes the fee reductions as adopted by the Board following many discussions with members of the SubPro IRT (ASP Implementation Team sub-track). ICANN encourages the community to review the [Applicant Support Handbook](#) for additional details on fee reductions ASP participants have available to them.

To address the comment on "Retention of Support Eligibility Through Delegation Intent," ICANN is not required to continue providing financial support to ASP recipients who, once approved as registry operators, fail to verify their ongoing eligibility or do not provide the requested supporting documentation. As outlined in Clause 4, Paragraph 3 of the ASP Terms and Conditions, ICANN may request, at any time (including after the Phase 2 Support Applicant Review Panel (SARP) evaluation), that an applicant verify their continued eligibility in accordance with Section 6.6 and Section 1.2 of the ASP Handbook, as well as applicable policies approved by the ICANN Board. ICANN reserves the right to request financial and other information as needed, and ASP-supported applicants agree to comply with such requests.

In cases where an Applicant Support Program registry operator requests an assignment or change of control, the provisions in Section 7.5(g) of the proposed Next Round RA apply. Under these terms, the registry operator may be required to repay all financial support received through the ASP, plus an additional 10% of the funding provided during the application process.

In response to concerns that the ASP does not provide additional post-delegation support to registry operators, or that ASP applicants should be treated as a distinct category of registry operators, it is important to note that no policy recommendation supports such differentiation. Supported applicants are subject to the same standards as all other gTLD applicants, aside from receiving fee reductions and access to capacity development (a resource that is not exclusive to ASP participants). The same approach applies once ASP applicants become registry operators: they are eligible for reduced fees and may benefit from online capacity development, though the latter is still under consideration.

Lastly, to address the comment asking for clarity on the consequences if an ASP registry operator no longer qualifies for support (whether voluntarily disclosed by the registry operator or discovered through other means), the registry operator loses the financial benefit of the discounted fees and would no longer be entitled to such support from the point at which eligibility ends. For these reasons, the proposed Next Round RA sufficiently addresses this issue, and no changes are needed.

Topic: Recommendation 20.8 (Application Change Requests for .BRAND TLDs)

1c. Does the proposed Next Round RA meet the intent of the policy Recommendations and Topics of Recommendation 20.8 (Application Change Requests for .BRAND TLDs)?

Comment Summary:

Comments raise concern that the proposed Next Round RA does not fully implement Recommendation 20.8 on Application Change Requests (ACRs) for .BRAND TLDs. Except for pre-delegation, the draft lacks a clear mechanism for reclassifying a TLD as a .BRAND post-application as well as providing transparency around such requests, defined timelines, evaluation criteria, and fair pathways for applicants that miss the initial designation window. Specification 13 provides some differentiation for .BRAND registries but is limited in scope and does not address ACR processes. Commenters suggested adding explicit RA provisions or references to supporting policy frameworks that recognize .BRAND applicants' ability to submit expedited, less burdensome ACRs, clarify acceptable changes and approval pathways, and ensure ICANN processes such requests efficiently. Commenters expressed concern that

without these updates, .BRAND applicants would risk facing rigid procedures that discourage participation.

Analysis:

During the application process, .BRAND applicants may change their applied-for string as a result of a contention set. As a result, the definition of .BRAND TLDs has been updated to be consistent with the policy requirements and alternative text is provided in Specification 13, alternative Sections 9.3(i) and 9.5 specifically address Recommendation 20.8. Additional information can be found in the latest draft of the New gTLD Program AGB Section 2.8.1 “Application Change Requests Overview.”

In response to concerns regarding .BRAND applicants and the ACR process, ICANN notes that the ACR process is covered in the AGB, applies during the application phase, and is the same for all applicants rather than a topic addressed in the RA. ICANN remains committed to reviewing and processing ACRs efficiently, fairly, and without unnecessary delay. For additional details, please refer to the provisions in Section 2.8, (Application Change Requests) and Section 4.3.2 (.BRAND String Change Requests Requirements) of the AGB.

In response to the request to amend Section 9.3 of Specification 13 to allow “phonetic equivalents where a textual element is a symbol that cannot be used in the DNS,” it should be noted that the SubPro Final Report does not include any recommendation directing ICANN to modify the Next Round RA to accommodate such phonetic equivalents. Nor is this issue addressed in the TMCH requirements, which only permit exact matches of registered trademarks in domain names. While the TMCH Guidelines suggest that a trademark may be spelled out using appropriate words in an official language, this concept—though potentially worth exploring—seems to raise broader policy implications. ICANN recommends that such a proposal be brought forward through the established policy development process. For additional information please refer to prior work on this subject:

<https://www.icann.org/en/announcements/details/trademark-clearinghouse-update-implementation-material-for-public-comment-24-9-2012-en>

Topic: Recommendation 21.6 (Two-character ASCII Labels)

1d. Does the proposed Next Round RA meet the intent of the policy Recommendation 21.6 (Two-character ASCII Labels)?

Comment Summary:

Comments note that the proposed Next Round RA lacks a clear contractual or procedural framework for the release of two-character ASCII domain labels, including how applications will be evaluated, how objections or government concerns will be addressed, and what timelines or criteria will apply. While Specification 5 references reserved names, it does not establish a transparent or predictable process for releasing two-character labels. Reliance on past Registry Services Evaluation Policy practices leaves uncertainty, as the proposed Next Round RA provides no guaranteed or streamlined path for Next Round applicants. Further, one commenter recommended expanding the list of reserved second-level domain names under Specification 5 to include terms from the Separable Country Names List, in order to promote policy consistency and minimize end-user confusion.

Analysis:

Recommendation 21.6 directs ICANN to update Specification 5 of the Next Round RA to incorporate the measures related to second-level Letter/Letter two-character ASCII labels, as adopted by the ICANN Board on 8 November 2016, to help avoid confusion with corresponding country codes and this was done. The process for registry operators to request the release of two-character ASCII labels has been in place since 13 December 2016 and is now incorporated in Specification 5, Section 2.

In response to the recommendation to expand the list of reserved second-level domain names in Specification 5 to include terms from the Separable Country Names List defined in the AGB, it is important to note that Specification 5, Section 4 (“Country and Territory Names”) already obligates registry operators to reserve specific second-level names. This requirement is further supported in Section A2.2 of the AGB, which references the Separable Country Names List (Table A2-1). Also, ICANN relies on the ISO 3166-1 standard as the authoritative source for these designations and remains committed to applying the standard consistently. Any changes must come from the ISO-3166 Maintenance Agency; ICANN cannot alter the list unilaterally. We encourage stakeholders to engage directly with ISO for updates.

The AGB also includes rules for the use of country and territory names at the top level, requiring governmental support or non-objection due to the geopolitical sensitivity and global visibility of such strings. Affirmation 21.5 of the SubPro Final Report confirms that the Working Group supports maintaining the reservation of all strings currently listed in the Reserved Names schedule at the second level. Any changes to that schedule must follow the appropriate process in effect at the time.

At the second level, Specification 5 of the Next Round RA provides protections for country and territory names, based on Governmental Advisory Committee (GAC) advice. These protections include safeguards such as requiring approval from the relevant government(s) before certain names may be released for registration.

Both the AGB and the proposed Next Round RA share the same underlying objective, which is to ensure appropriate protections for country and territory names, tailored to the level at which those names are used.

Topic: Recommendation 22.5 (Continued Operations Instrument)

1e. Does the proposed Next Round RA meet the intent of the policy Recommendation 22.5 (Continued Operations Instrument)?

Comment Summary:

Comments highlight that SubPro recommended re-evaluating the need for a Continued Operations Instrument (COI) in the next round, ensuring it reflects market maturity, past experience, and alternative continuity mechanisms. Some commenters expressed that the COI is now outdated, burdensome, and disproportionate to the original risk. Separately, some comments indicated support for its removal, noting the original COI was onerous and that its elimination shifts the cost of emergency operations to ICANN.

Analysis:

The COI was originally intended to provide financial support for the Emergency Back-end Registry Operator (EBERO) program. However, both ICANN org and registry operators experienced significant operational challenges in managing the COI. During the New gTLD Program Operational Design Phase, the COI was evaluated, and it was determined that

exploring alternatives that are less administratively burdensome would be beneficial. Therefore, the COI is no longer required as indicated by the intentional omission of Specification 8 in the proposed Next Round RA.

ICANN is accounting for the continued funding of the EBERO program through a combination of the gTLD application fee and its operational budget.

Topic: Recommendations 25.5, 25.6, 25.7, and 25.8 (Variant TLDs)

1f. Does the proposed Next Round RA meet the intent of the policy Recommendations 25.5, 25.6, 25.7, and 25.8 (Variant TLDs)?

Comment Summary:

Comments indicate that while the Next Round RA references IDN variant management (Specification 14), its provisions are underdeveloped and lack clarity on operational, support, and compliance mechanisms. Some commenters indicated that the proposed Specification 14 was not included in the Public Comment package, making it impossible to confirm consistent management of variant labels, synchronized operational rules, or enforcement of security, stability, and user experience principles. They further suggested that the Next Round RA does not clearly reflect SubPro recommendations, including single-application treatment of primary and variant TLDs, same-entity control, variant consistency, user experience protections, or adherence to RZ-LGRs and the ICANN variant management framework. Operational details such as zone file behavior, DNS redirection, and registration restrictions are not specified.

Analysis:

The proposed Next Round RA posted for Public Comment includes a new specification, Specification 14, dedicated to the contractual obligations for the management of Variant TLDs and Specification 6, Section 7 for the management of the variant domain names at the second level, to account for Recommendations 25.5-25.7 from the IDN EPDP Phase 1. This includes the stipulation that variant TLDs must be managed by the same registry operator and backend provider; all allocatable variant labels must be registered to the same registrant as the primary; and all allocatable variant labels in the set must only be allocated to the same entity/registrar.

The only bracketed text in the proposed Specification 14 is Section 2.13 “Fees” is to account for Recommendation 7.4 and Recommendation 7.5 of Phase 1 Final Report on the IDN EPDP Phase 1, pending a decision from the ICANN Board. Fees for variant TLDs, specified in Section 2.13 of Specification 14, will be addressed in the second Public Comment proceeding for the Next Round RA.

Topic: Recommendation 26.5 (Delegation Testing)

1g. Does the proposed Next Round RA meet the intent of the policy Recommendation 26.5 (Delegation Testing)?

Comment Summary:

Comments indicate that while the proposed Next Round RA includes a provision for delegation testing under Section 2.20 to address Recommendation 26.5 on Delegation Testing, it lacks clarity and transparency. Section 2.20 requires completion of ICANN-identified testing within 12 months but does not specify what the procedures are, where they are published, whether they

will be standardized, or whether they differ by TLD type. The uniform 12-month deadline does not account for the diverse needs of applicants, such as ASP-supported applicants, IDN/variant TLDs, or .BRAND TLDs, which may require tailored testing approaches. Comments recommend publishing delegation testing criteria and procedures in advance, ensuring testing is proportionate and support-oriented, providing differentiated tracks for specific applicant categories, and committing to ongoing engagement, feedback, and retesting pathways. Without these provisions, the Next Round RA is considered too vague and inflexible to fully satisfy SubPro Recommendation 26.5.

Analysis:

As highlighted in the comments, Section 2.20 ("Delegation Testing") of the Next Round RA references the testing requirements and procedures that registry operators must complete prior to TLD delegation into the root zone. Some commenters suggested that ICANN provide additional details about these procedures, including timelines and deadlines.

ICANN has identified the testing and procedures that will be required for a registry operator to complete before the registry signs onto the registry agreement on the ICANN website under "[Registry System Testing](#)". This includes the procedural and process-related information for both Pre-Delegation Testing (PDT) and Registry System Testing (RST), as applicable, which are better situated outside of the Next Round RA.

Section 2.20 also provides that a registry operator has twelve months from signing to complete those testing and procedures identified and further provides flexibility, allowing registry operators to request an additional 12 months to complete delegation. Those that request additional time must demonstrate that they are working diligently and in good faith toward successfully completing the steps necessary for delegation of the TLD. There are no policy recommendations supporting differentiated timelines for specific categories of applicants.

Topic 29 (Name Collisions)

1h. Does the proposed Next Round RA meet the intent of the policy Recommendations regarding Topic 29 (Name Collisions)?

Comment Summary:

Comments note that while the proposed Next Round RA includes provisions for emergency transition and registry performance, it does not address name collision policies, frameworks, or obligations. Key elements such as the Name Collision Occurrence Management Framework , controlled interruption requirements, and pre- or post-delegation collision assessments are missing, leaving registry operators unclear on applicable risk controls, timing, and enforcement. The RA also lacks contractual references to standardized mitigation frameworks or expectations for handling name collisions. Recommendations include adding clauses or a new specification to require adherence to ICANN's current name collision framework, outline notification and mitigation steps, allow applicants to prepare in advance, and commit ICANN to publishing high-risk strings and response protocols. The absence of such language undermines security, stability, predictability, and Topic 29 guidance.

Analysis:

ICANN notes that the suggestions related to the high-risk string identification process are not intended to be incorporated as contractual obligations within the Next Round RA because they

pertain to the evaluation process, not to registry obligations. For further details, please refer to Section 6.7 “Name Collision” of the AGB.

For comments specific to the mitigation framework and how name collision reports should be managed, please refer to Specification 6, Section 6 of the proposed Next Round RA.

Topic: Recommendation 9.10 and 31.17 (Registry Voluntary Commitments)

1i. Does the proposed Next Round RA meet the intent of the policy Recommendation 9.10 and 31.17 (Registry Voluntary Commitments)?

Comment Summary:

Comments indicate that while Specification 11 incorporates Registry Voluntary Commitments (RVCs), the proposed Next Round RA lacks clarity on enforcement and public transparency. It does not specify how RVC breaches will be handled, whether PICDRP updates reflect RVC changes, or how RVCs differ from other obligations, risking confusion between voluntary and required commitments. There is no requirement for ICANN to maintain a centralized, discoverable repository of RVCs, their updates, rationales, or objection windows, nor a consistent format for presentation. The absence of defined monitoring, breach notification, and dispute resolution processes leaves the enforceability of RVCs’ uncertain. Without clearer procedural, contractual, and public visibility mechanisms, RVCs risk remaining symbolic rather than meaningfully binding and accountable, contrary to the intent of Recommendations 9.10 and 31.17.

Analysis:

Clarity and Distinction Between RVCs and PICs

Recommendation 9.10 requires that RVCs be included in the Next Round RA, while Recommendation 31.17 expands this to include RVCs that resolve objections or address GAC Advice. To reflect this distinction, the Next Round RA proposes that all approved RVCs will be included in Specification 11, with those used to resolve objections or address GAC Advice specifically identified in Section 2(b). This structuring provides clarity around the origin and context of each RVC, helping to address concerns about confusion between commitments that an applicant proposes on its own and those commitments that were incorporated into the applicable registry agreement as a condition for the application to proceed to delegation.

Enforceability and Applicability to the Public Interest Commitment Dispute Resolution Procedure

The Next Round RA permits incorporation of RVCs that have been approved by ICANN through the Registry Commitments Evaluation (RCE) process, as detailed in the AGB Section 6.8.3.2, into Specification 11, Section 2, ensuring they are binding contractual commitments. As such, RVCs—whether introduced voluntarily, to resolve an objection, or to address GAC Advice—are enforceable by ICANN and subject to the Public Interest Commitment Dispute Resolution Procedure (PICDRP).

Commenters noted that the PICDRP has not been updated to reflect how it will address RVCs. While updates to the PICDRP have not been proposed at this stage, the incorporation of RVCs within Specification 11 brings them into the scope of the existing enforcement framework, including the PICDRP. As with most contractual provisions, detailed compliance procedures exist outside the registry agreement itself and may be addressed separately through implementation planning.

Transparency and Public Accessibility

In response to concerns regarding transparency, ICANN confirms that all registry agreements—including those with RVCs—will be published. RVCs submitted with applications or through the ACR process will be made publicly available alongside other public portions of the application. Approved RVCs included in the registry agreement will be readily visible within Specification 11 of each registry’s agreement. This centralized and consistent presentation is intended to support discoverability and accountability.

Topic: Registration Data Policy

2a. Does the proposed Next Round RA meet the intent of the Registration Data Policy?

Comment Summary:

Comments note that the proposed Next Round RA includes updates in Section 2.5 and Specification 4 to reflect the Registration Data Policy, but there are mixed views on whether these additions fully meet the intent of policy. While some see it as compliant, others highlight that the proposed Next Round RA does not explicitly acknowledge the finalized policy or reference key elements such as the specific data to be collected, ICANN’s Minimum Required Data Set, accuracy obligations, or data-processing agreements. It also lacks provisions for mechanisms like “SSAD-Lite” or future data disclosure models, and Specification 4 does not clearly define coordination between registries and registrars for data accuracy, transfers, or access. Comments recommend explicitly incorporating the final Registration Data Policy, detailing core registry obligations, including mechanisms for evolving compliance models, and requiring transparency reports and auditable logs of data access actions.

Analysis:

Inclusion of the Registration Data Policy in the Next Round RA:

Section 2.2 of the Next Round RA requires registry operators to comply with all applicable Consensus Policies, including the Registration Data Policy. As such, it is not necessary for the Next Round RA to explicitly reference the policy by name. This approach is consistent with long-standing contractual structures that incorporate Consensus Policies by reference rather than through duplication of their specific terms. Registry operators are expected to review the Consensus Policies maintained on ICANN’s website to ensure compliance with all applicable obligations.

Updated Data Fields and Redaction Requirements:

Specification 4 of the Next Round RA reflects updated requirements from the Registration Data Policy. In particular, Section 1.5.3 of Specification 4 requires that registration data be redacted in accordance with ICANN Consensus Policies and Temporary Policies.

Disclosure Mechanisms and SSAD:

Regarding comments about the lack of contractual language addressing disclosure mechanisms such as SSAD or SSAD-Lite, it is important to note that neither the EPDP on the Temporary Specification for gTLD Registration Data recommendations nor the Registration Data Policy mandates a centralized system for disclosure. The Registration Data Request Service (RDRS) currently operates as a voluntary mechanism and does not constitute a requirement under ICANN Consensus Policy. Therefore, no contractual obligation to use or reference RDRS is

appropriate at this time. Should a future policy mandate a specific system for disclosure, it would become binding on registry operators under Section 2.2 as a Consensus Policy.

Topic: Protection of IGO and INGO Identifiers in All gTLDs Policy (See Specification 5, Section 6)

2b. Does the proposed Next Round RA meet the intent of the Protection of IGO and INGO Identifiers in All gTLDs Policy (See Specification 5, Section 6)?

Comment Summary:

Comments note that while Specification 5 of the proposed Next Round RA broadly aligns with the intent of the Protection of IGO and INGO Identifiers in All gTLDs Policy, several gaps remain. The proposed Next Round RA does not explicitly cite the Consensus Policy, reference the authoritative list of protected identifiers, clarify whether the list is updated, or outline how registry operators will be notified of changes. It also lacks guidance on enforcing reserved names during Sunrise or Landrush phases, monitoring unintended registrations, cooperating with ICANN compliance or dispute resolution providers, and handling consent, waivers, or dispute resolution for exceptions. Commenters recommended explicitly referencing the Consensus Policy, linking to the authoritative list, defining consent-based registration processes, and adding procedural details on registry operator responsibilities to ensure transparency, consistency, and enforceable compliance.

Analysis:

Section 2.2 of the proposed Next Round RA requires registry operators to comply with all applicable Consensus Policies, including the Protection of IGO and INGO Identifiers in All gTLDs Policy. Registry operators are expected to consult the Consensus Policies published on ICANN's website to ensure full compliance with applicable obligations, including name reservations, exceptions, and implementation timelines.

ICANN acknowledges the request for increased clarity regarding the source, authority, and update process for the reserved names list (e.g., Red Cross, IOC, IGOs). The list of reserved identifiers under this Consensus Policy is maintained on ICANN's website and reflects the scope defined by GAC advice and the policy's implementation.

Regarding comments raised about the enforcement of reserved names during specific launch phases, registry operators are required to enforce reserved names at all times, including during Sunrise and Launch phases, as part of their general obligation to comply with Consensus Policies. Specification 7 of the Next Round RA outlines requirements for the Sunrise period with additional information available in the Trademark Clearinghouse Requirements.

The commenters sought clearer guidance on how IGOs or INGOs may consent to or request the delegation of their own protected identifiers. However, it is unclear whether the comment pertains to top-level or second-level registrations. Additional information on both scenarios is provided below:

- For top-level domains, Section 6.2.2.2.1 of the Applicant Guidebook outlines the Exception Procedure for Reserved Names, which allows eligible entities to apply for delegation of a reserved string with appropriate documentation.
- For second-level registrations, the *Protection of IGO and INGO Identifiers in All gTLDs Policy* permits certain exceptions with documented consent. Details are available on

ICANN's website, and ICANN will assess whether to publish additional procedural documentation to assist registry operators and protected organizations.

Topic: IDN EPDP Phase 1 Final Report (See Specification 14)

2c. Does the proposed Next Round RA meet the intent of the IDN EPDP Phase 1 Final Report? (Note: Recommendations 7.4 and 7.5 of Phase 1 Final Report on IDN EPDP are pending ICANN Board adoption.)

Comment Summary:

Comments indicate that the proposed Next Round RA generally aligns with the intent of the IDN EPDP Phase 1 Final Report in Section 2.23 and Specification 14, but several concerns remain. Specification 14 was not included in the Public Comment materials, preventing verification of whether variant label management rules, RZ-LGR application, and same-entity/same-meaning requirements are properly implemented. The RA only makes generic references to variant TLDs and states that Specification 14 "will apply," without enforcing specific operational, eligibility, or compliance rules. Details are also lacking on how ICANN Compliance will monitor adherence, define breaches, or oversee variant behavior during testing and operation, which is critical for user assurance, UA-readiness, and DNS stability. Comments recommend acknowledging the pending adoption of Recommendations 7.4 and 7.5 and committing to amend Specification 14 accordingly to ensure accountability, consistency, and full alignment with IDN EPDP requirements.

Analysis:

ICANN notes that a dedicated specification—Specification 14—has been developed specifically to address requirements for Variant TLDs. Additionally, Section 2.23 of the Next Round RA reinforces that the registry operator must operate both the Primary TLD and any Variant TLD(s) in accordance with the requirements outlined in Specification 14.

To address concerns regarding ICANN Compliance's ability to verify adherence to contractual obligations, Section 2.1 of Specification 14 makes clear that the registry agreement applies to the Primary and Variant TLDs, collectively referred to as the "TLD Set."

With respect to Recommendations 7.4 and 7.5 of the IDN EPDP Phase 1 Final Report, ICANN notes that these recommendations are still pending a decision from the ICANN Board. For more details please refer to: <https://www.icann.org/en/system/files/files/scorecard-idn-epdp-phase-1-recommendations-11jun24-en.pdf>.

Topic: Phase 1 Final Report on the Review of All RPMs

2d. Does the proposed Next Round RA meet the intent of the Phase 1 Final Report on the Review of All RPMs? (See Sections 6 and 7 of Specification 9 ; Section 1 of Specification 7; and Section 4 of Specification 13.)

Comment Summary:

Comments indicate that while the proposed Next Round RA includes updates to RPM-related sections (Specifications 7, 9, and 13), it does not fully implement the improvements recommended in the RPM Phase 1 Final Report. Key concerns include:

-
- Specification 9 references Sunrise procedures and the Registry Operator Code of Conduct, but detailed reforms—such as revised Sunrise timelines, dispute resolution options, and cross-system reporting—remain under discussion and are not fully codified.
 - Proposed language addressing Sunrise RPMs is close to the intended recommendations but is narrower than advised, focusing only on Sunrise operation rather than the full scope of mandatory RPMs, suggesting revisions are needed to prevent circumvention of RPM purposes.
 - Specification 7 references URS, TMCH, Sunrise, and Claims, but lacks updates recommended in the RPM Phase 1 Final Report, including standardized complaint formats, procedural safeguards, appeals processes, operational obligations, and refined TMCH validation and notice requirements.
 - Specification 13, governing .Brand TLDs, does not yet reflect exemptions or flexibility for certain RPMs, such as URS, Sunrise, or Claims, which were recommended for .Brand or other exempted TLDs.
 - TM-PDDRP references remain unchanged, without incorporating Phase 1 feedback on limited use, awareness, or process clarity.

Overall, the RA shows movement toward implementing RPM recommendations but lacks finalized, enforceable language and complete alignment with Phase 1 guidance, particularly regarding operational clarity, exemptions, and compliance mechanisms.

Analysis:

Specification 13 (.BRAND) Exemptions

Under Specification 13, Section 4 of the Next Round RA, registry operators of qualified .BRAND TLDs are exempt from certain Trademark Clearinghouse (TMCH) obligations—specifically Integration Testing, Sunrise, and Claims Services—if they choose not to use them. As a result, they are not required to pay the associated Rights Protection Mechanism (RPM) fees.

This exemption aligns with:

- Trademark Claims Final Recommendation #1
- Sunrise Final Recommendation #2

from the RPM Phase 1 Final Report, which affirm that mandatory Sunrise and Claims Periods remain the default but allow exceptions for TLDs that qualify under Specification 13 or Section 6 of Specification 9. These exceptions reflect the unique nature of .BRAND TLDs, which are generally not open to public registration and therefore warrant a more flexible application of RPMs.

Reference to RPM Phase 1 Final Report in the RA

On the request to reference the RPM Phase 1 Final Report, the proposed Next Round RA already incorporates this by requiring registry operators to comply with all applicable Rights Protection Mechanisms, which will reflect relevant updates arising from the Phase 1 RPM review (see RA Section 2.2). Updates to the Uniform Rapid Suspension (URS) system are reflected in the URS Rules and Procedures, which registry operators must follow per Specification 7, Section 2. This design allows the URS to be updated without modifying the RA directly. Any

further changes to the URS resulting from the continuing implementation of RPM Phase 1 Final Report will be published through revised URS materials.

With respect to URS Final Recommendation #8 from the RPM PDP Final Report, ICANN org is currently developing a formal compliance mechanism to handle complaints related to URS providers and registrars. While ICANN Compliance already addresses registry operator failures to enforce URS decisions, and engages with registrars or providers upon receiving complaints, the new mechanism will aim to make this process more transparent and well-defined.

TMCH Criteria, Notices, and Rules

Suggestions to refine TMCH validation criteria, notice requirements, and rules are noted. However, the RA is not typically the vehicle for such operational updates. Instead, changes to TMCH are incorporated into the TMCH Requirements, which are binding under Specification 7, Section 1. Registry operators are required to comply with the current TMCH Requirements, which ICANN may revise from time to time in immaterial respects. Updates—such as the revised Claims Notice aimed at improving clarity—will be included in the updated TMCH Requirements as part of the broader RPM Implementation work.

Trademark Post-Delegation Dispute Resolution Procedure (TM-PDDRP)

The RA is not the primary mechanism for TM-PDDRP updates. However, the TM-PDDRP Final Recommendation on Rule 3(g)—allowing joint complaints or consolidation of complaints by unrelated entities—was adopted and reflected in the revised TM-PDDRP Rules effective 1 May 2025.

Topic: Operational Updates

Q3: Is there any feedback you wish to provide on the proposed operational changes?

Comment Summary and Analysis:

I. Emergency Transition (Section 2.13)

Comment Summary:

- ICANN's discretion to designate an EBERO is considered overly broad and vague without a clear process.
- **Recommendation:** Introduce documented thresholds, a notification process, and remediation opportunities before invoking emergency transition.

Analysis:

- A. The mechanisms to designate an emergency operator have been clearly set forth in Section 2.13 and the Registry Transition Process, Section 3 (Emergency Back-End Registry Operator Temporary Transition Process). ICANN's proposed changes to Section 2.13 further clarify those mechanisms before it may make an Emergency Transition. For additional information regarding the Emergency Escalation process please refer to Section 7 of Specification 10.
- B. Note: Section 2.13(a)(ii) remains bracketed and subject to further revision. ICANN may update this section in response to community input for the second Public Comment proceeding.

II. Operational Updates and Contractual Obligations (Section 2.11)

Comment Summary:

- The RA shows good-faith efforts to incorporate lessons from the 2012 round.
- Enhanced obligations (e.g., audits under Section 2.11, operational changes) lack supporting templates, guidance, or procedural documentation.
- **Recommendation:** ICANN should publish audit templates, standardized operational change request forms, and guidance on contractual compliance prior to the RA taking effect.

Analysis:

- A. ICANN notes that no substantive changes were made to Section 2.11 beyond clean-up edits.
- B. While some commenters requested templates or procedural guidance to support compliance, such materials are not included in the registry agreement itself. However, ICANN is developing educational resources for new registry operators to accompany the application round.

III. Fees, Fee Schedule, and Names a Registry Operator may Register and Activate (Article 6, and Specification 5, Section 3.2)

Comment Summary:

- Support for registry-level fees aligning with the fiscal year rather than the calendar year.
- Objection to date references (January 1, 2025) in Section 6.1(a) of Article 6.
- Support for increasing the threshold of domains a Registry Operator can register from 100 to 500.

Analysis:

- Regarding the comment objecting to the date reference in Section 6.1(a), ICANN notes that this reference is intentional and provides a time-stamped baseline for applicants and new registry operators to understand the applicable fees at a recent point in time, which only adjusted pursuant to Section 6.5, prior to operationalizing the public webpage.

IV. Arbitration Timelines (Sections 4.3(a) and 4.3(h))

Comment Summary:

- The 14-calendar-day deadline to initiate arbitration following termination of mediation is too short.
- Challenges include multi-level internal approvals, preparation time, and holiday periods.
- **Recommendation:** Extend the arbitration initiation window to 30 calendar days or 20 business days.

Analysis:

-
- ICANN notes that this 14-day period follows a mediation phase. The expectation is that a registry operator has sufficient lead up time to the time period to initiate arbitration, including visibility into the anticipated timeline for planning purposes for the registry operator, to be adequately prepared to move forward with arbitration if mediation does not result in resolution. That said, ICANN may consider extending such a timeline to 21 days in response to Public Comment.

V. .BRAND TLD Provisions (Specification 13)

Comment Summary:

- Proposed change to update the definition of Trademark Licensee to include individual persons that have a written trademark license agreement for use of the registered trademark.
- Clarifications suggested for arbitration outcomes to preserve .BRAND status when determinations are overturned.
- A specific concern was raised about the proposed requirement that, following an Exemption Disqualification Date, the registry operator must comply with TMCH requirements and begin a Sunrise Period within 60 days (consistent with longstanding Specification 13 obligations), and a Claims Period within 90 days of the Sunrise. While the 60-day Sunrise requirement is considered reasonable, the 90-day limit on Claims was described as unnecessarily restrictive and not based in policy. Commenters suggested deleting the strict 90-day timeline and clarifying instead that the Claims Period must occur before any Limited Registration Period or General Availability, ensuring the policy objective is met without imposing arbitrary timing.

Analysis:

- In response to the request to expand the definition of “Trademark Licensee” to include individuals:
 - ICANN is concerned that such a change may undermine the original intent of the .BRAND specification. The exclusion of individuals from the definition is intentional and grounded in the original rationale for Specification 13. As reflected in the Brand Registry Group’s supporting statement (see <https://newgtlds.icann.org/sites/default/files/brand-spec-13-statement-06dec13-en.pdf>, page 3), the purpose of Specification 13 was to establish a narrow exception to certain Registry Agreement obligations (e.g., Code of Conduct, TMCH, registrar use) on the basis that .BRAND TLDs are not open to public registration.
 - Expanding the definition to include individuals would undermine this rationale and could blur the distinction between .BRAND TLDs and open/generic TLDs. In particular, it could lead to:
 - A .BRAND TLD being operated in practice like a generic TLD via individual registrations;
 - Registrations occurring outside of the registrar channel, bypassing obligations under the RAA and Consensus Policies; and
 - The .BRAND model being used in ways far beyond the limited exception Specification 13 was designed to create.

-
- In response to requesting clarifications for arbitration outcomes to preserve .BRAND status when determinations are overturned:
 - ICANN considered the suggestion to add language preventing ICANN from making subsequent determinations on matters previously overturned in arbitration. However, ICANN does not support the proposed change because it would introduce uncertainty into a process that is currently clear and predictable.
 - As drafted, the process is straightforward: if ICANN determines, in its reasonable discretion, that a TLD no longer qualifies as a .BRAND TLD, the registry operator may either (1) take corrective action within 30 days, or (2) initiate a dispute. The proposed carve-out would complicate this process if ICANN were to provide a second notice based on new facts or changed circumstances. In such cases, ambiguity could arise as to whether the matter had already been resolved in arbitration, leaving the registry operator unsure of its obligations. To date, ICANN has not provided such a notice that, in its reasonable discretion, a TLD no longer qualifies as a .BRAND TLD. Accordingly, ICANN proposes to retain the existing language without modification.
 - Regarding concerns about the requirement to commence the Claims Period within 90 days following the Sunrise Period (Specification 9, Section 7), ICANN is reviewing the proposed language and will revisit it during the second Public Comment period on the Next Round RA.

VI. DNS Abuse Obligations

Comment Summary:

- Amendments in the proposed Next Round RA are not fully grounded in policy recommendations.
- Future DNS abuse obligations will continue to evolve.
- **Recommendation:** The proposed Next Round RA should anticipate changes and require registry operators to implement any new DNS abuse obligations adopted through policy or community processes.

Analysis:

- ICANN acknowledges the importance of these issues and notes that related obligations are currently under discussion within the ICANN community.
- Any changes to registry or registrar obligations in this area are expected to be considered through the Policy Development Process (PDP), not in the development of the Next Round RA. Please see the request from the GNSO Council initiating a comprehensive Issue Report on DNS Abuse Mitigation Gaps: https://gnso.icann.org/sites/default/files/policy/2025/draft/dns-abuse-small-team-report-04aug25-en.pdf?utm_source=chatgpt.com

VII. Typographical Update and Registrar Accreditation Agreement (RAA)

Comment Summary:

-
- Typographical and logical inconsistencies noted (i.e., Section 2.13(a)(ii)(A) wording).
 - RAA capitalization should be restored to its industry-standard usage.

Analysis:

- Regarding the question of the use of “and” instead of “or” in Section 2.13(a)(ii). ICANN notes this is not an error and is intentional—the “and” is necessary to reflect that both conditions in subclause (A) and (B) in Section 2.13(a)(ii) must be met to trigger an emergency transition.
- To address the objection to the change in capitalization, ICANN proposed the change to align with internal consistency standards but will revert to the prior capitalization based on community feedback. This revision will be reflected in the redline for the second Public Comment proceeding.

Section 4: Next Steps

All Public Comments received were reviewed and carefully considered by ICANN org. Any substantive changes required to the proposed Next Round RA that impact SubPro Recommendations will be reviewed with the SubPro IRT.

A second Public Comment proceeding is expected for the proposed Next Round RA in September 2025. ICANN expects the second Public Comment period will be open for 40 days. Following the second Public Comment proceeding, ICANN will prepare the final Public Comment Summary and Analysis report and submit the draft Next Round RA to ICANN Board of Directors for consideration.

RrSG Public Comment: Proposed Next Round Base gTLD Registry Agreement - Public Comment 1 of 2

21 July 2025

The Registrar Stakeholder Group (RrSG) welcomes the opportunity to provide a comment on the Proposed Next Round Base gTLD Registry Agreement.

Updating the Base Registry Agreement to incorporate changes from Board-approved policy recommendations as well as other operational updates is a significant undertaking and the RrSG appreciates the dedication of those who worked on these revisions.

The RrSG has no substantive comments, and once again recognizes the work that went into providing these updates.

Thank you,

Owen Smigelski
Registrar Stakeholder Group Chair