

# ICANN org input on the [GNSO Guidance Process on Applicant Support](#)

*Thank you for the opportunity to provide input to the GNSO Guidance Process on Applicant Support. Please find below ICANN org's comments on select Guidance Recommendations for your consideration.*

**Guidance Recommendation 6: ICANN org to investigate the extent to which supported applicants that were awarded a gTLD are still in business as a registry operator after three years.**

- **ICANN org suggested revision:** “ICANN org to investigate whether supported applicants awarded a gTLD in the next round are still in business as a registry operator after three years.” This suggested revision is to clarify that the focus of the recommendation is on future rounds, rather than the previous round.

**Guidance Recommendation 7: In the scenario that there is inadequate funding for all qualified applicants in the Applicant Support Program, the recommended methodology for allocating financial support should be for ICANN org to allocate limited funding by way of fee reduction equally across all qualified applicants, while not hindering the efficiency of the process. In this context the working group agreed to assume, for the sake of equity, that one application equaled one string. This recommendation is made in the context of no additional funding being made available, however the group recommends that ICANN org, as a high priority, makes every effort to provide additional funding so that all successful applicants are supported.**

- **ICANN org comment:** It would be helpful if the GGP could clarify and confirm whether these guidance recommendations, if/when approved by the Board, are to be interpreted and implemented as interdependent (per p. 5 of the [GNSO Guidance Process Manual](#)), as opposed to individually. This is particularly important with regard to GR 7, 8, and 9 which, depending upon interpretation, could be viewed as incompatible. For example, to guarantee equal levels of support for all qualified applicants, ICANN org would need to wait until the end of the ASP application submission period to notify applicants of the precise level of support they have received, because it will be unclear how many qualified applicants will be utilizing available funding. To guarantee that all qualified applicants receive equal levels of support may limit the minimum threshold of support ICANN org can offer (see comments on GR8). To communicate evaluation results as early as possible (GR9) would require evaluation of ASP applications on an ongoing basis, but this seems to contradict GR7. Clarifying that GR 7, 8, and 9 are to be interpreted as

interdependent would clarify that the objectives therein are to be balanced, as a key aspect of the program's success.

Lastly, the GGP may want to note the ongoing work of the IDN EPDP Phase 1 related to variants (e.g. noting the IDN EPDP may allow for up to four variants) in respect of this part of the recommendation, "...for the sake of equity, that one application equaled one string."

**Guidance Recommendation 8: To mitigate the risk that the allocation of support under the Applicant Support Program could be diluted to the point of being unhelpful, ICANN org should designate a minimum level of support each qualified applicant must receive, and develop a plan if funding drops below that level.**

- **ICANN org comment:** It would be helpful for this Guidance Recommendation to consider how to balance objectives indicated in other Guidance Recommendations (e.g., equality, timeliness, and efficiency of communications) in the scenario that the number of qualified ASP applicants exceeds the designated minimum level of support and all additional resources articulated in the ASP Funding Plan (developed as part of implementing SubPro policy recommendation 17.12) have been exhausted. It may also be helpful to reference policy recommendation 17.12 to clarify that the GGP is not suggesting ICANN org only develop a funding plan for ASP if funding for supported applicants drops below a certain level.

Also see comment on GR7 re: clarifying whether GR 7, 8, and 9 are to be interpreted as interdependent.

**Guidance Recommendation 9: ICANN org should develop a flexible, predictable, and responsive Applicant Support Program in order to communicate the results of evaluation process and allow applicants to know about their range of support allocations as early as possible in a transparent manner.**

- **ICANN org:** See comment on GR7 re: clarifying whether GR 7, 8, and 9 are to be interpreted as interdependent.