

Subject: Business Constituency (BC) comment on Registry Stakeholder Group charter amendments

Date: Sunday, June 14, 2015 at 3:42:38 PM Eastern Daylight Time

From: Steve DelBianco

To: comments-rysg-amend-08may15@icann.org

The Business Constituency ("BC") appreciates the opportunity to provide comments to the proposed amendments to the Registry Stakeholder Group ("RySG") Charter posted for public comment on May 8, 2015 ([link](#))

In its proposed amendments, the RySG is making several adjustments to its Charter in order to increase the efficiency of operating the group. The BC believes that these amendments will assist the RySG in avoiding delays in its decision-making process. Additionally, the BC believes that the proposed amendments clarify the Observer status and the purpose of Interest Groups within the RySG.

However, the BC is concerned that the RySG continues to ignore recognition of non-retail registries as a separate constituency from the retail registries. Similarly, the BC believes that the RySG should have taken a serious look at eliminating the weighted voting procedure outlined in the RySG Charter.

The BC is mindful that one of the primary purposes of ICANN and the new gTLD program itself was to provide more choice for consumers as a benefit for the greater public interest. The BC believes that a failure to allow for the formation of voting constituencies and the weighted voting provisions (even if only optional) will continue to allow RySG policy positions to be dominated by those registries with a for-profit, retail registry business model, to the disadvantage of smaller, non-retail oriented registries.

The BC believes that the failure to create a system that puts all registry business models on parity with the legacy registry business models is a serious flaw in the proposed amendments.

Notwithstanding these reservations, the BC supports the proposed revisions, but it strongly urges the Board to request that the RySG consider further revisions to address these serious issues in the very near future.

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These comments were drafted by J Scott Evans and approved in accordance with our charter