

Subject: [reconsideration request] .Doctor TLD Reconsideration Request support letter from The Medical Registry LTD.

Date: Tuesday, March 24, 2015 12:13:44 AM Pacific Daylight Time

From: Sloan Gaon

To: reconsider@icann.org

Chris Disspain
Chair
ICANN Board Governance Committee

Dear Mr. Disspain,

I am writing to express our support for the

[Reconsideration](#)

[Request](#) submitted by Brice Trail LLC regarding recent Board actions regarding the .doctor gTLD, which requires

.doctor applicants to agree to “ensure that the domains in the TLD are ascribed exclusively to legitimate medical practitioners.”

As one of three applicants for .doctor, we fully agree with and support the statements and arguments made by Brice Trail LLC in their Reconsideration Request. Whilst this new requirement is not inconsistent with our plans for the management of the .doctor TLD, we do have concerns that the new restrictions could have a negative impact on our business.

While we do not intend to repeat Brice Trail’s Reconsideration Request chapter and verse, we do want to reiterate a two points which we believe key to their arguments:

- The Board Decision adopts Staff Action that violates ICANN policy expressed in its bylaws and the Guidebook
- The addition of the new Public Interest Commitment discriminates against all applicants for .doctor in comparison to other registries for other ‘highly regulated’ strings.

That one TLD out of some 1900 should be singled out for special treatment in the form of an additional Public Interest Commitment seems to be extraordinary and also inconsistent with previous NGPC treatment of GAC advice. The NGPC had dealt with the GAC safeguard advice by categorizing strings as belonging to either ‘regulated’ or ‘highly regulated’ sectors and developed public interest commitments accordingly. To apply additional requirements to one string, which the NGPC had originally recommended be in the ‘regulated’ sector on the basis that the term ‘doctor’ could be used in many circumstances and was not solely associated with the ‘medical profession’ does appear to be an significant deviation from the NGPC’s original opinion on this matter and absent any justifiable explanation.

We ask that this letter be taken into consideration by the Board Governance Committee at the time they consider the Reconsideration Request of Brice Trail LLC.

Yours sincerely

Sloan D. Gaon

Sloan Gaon
The Medical Registry Limited