Ms. Sally Costerton
Interim CEO ICANN
April 9, 2024

<div align="center">Re: DRAFT New gTLD Program: Next Round Applicant Support Handbook</div>

Dear Sally,

I write to you as our Interim CEO, and also in your prior roles as VP of Global Engagement and CEO of a global public relations firm.

As you know, I am the co-founder of NCUC and co-chair of RPM PDP WG. Along with the ICANN Community, I am deeply committed to the promise of the Applicant Support Program to increase global diversity and representation in the New gTLD Program.

I write because the Draft *Next Round Applicant Support Handbook* (Handbook) is unreadable to the very groups we want to read and use it, namely, Indigenous Peoples and Tribes, small nonprofit, NGOs, and charitable organizations, and micro and small sized social impact and public benefit companies, particularly those in the Global South. Below, I bring to your attention four specific examples that make the Handbook particularly difficult for its intended audience to understand.

First, Key definitions (e.g., "social impact business") are buried in the footnotes. As friends remind me, "only lawyers read footnotes." Everything an applicant needs to know and work with should be in the main paragraphs. To the extent there need to be disclaimers and legal language, these can be moved to the footnotes.

Second, the vocabulary is written at a very high level. Using testing tools, NCSG found it to be "very difficult" and at the level of an English speaking college graduate. The sentences are also long, complex, and redundant. To help guide a revision of the Handbook, I've provided one example of how sentences can be streamlined and worded more clearly below. As you will see, this revision makes the text more accessible to all.

Third, the Handbook requires an advanced knowledge of how ICANN functions. For example, the Handbook assumes the reader will know the difference between the Applicant Support Program and the New gTLD Program. It is highly likely that they will not. The Handbook should be written in a way that someone who is unfamiliar with ICANN in particular, and how the gTLD program works in general, can pick it up, and understand it without reference to other sources.

Fourth, the Handbook assumes it is being read with a lawyer. Given the target audience of the Handbook I doubt that is the way it will happen. Indigenous Peoples and Tribal leaders, heads of small nonprofit, NGOs, charitable organizations, and micro and small sized business owners, are likely to see ICANN New gTLD Marketing, become interested, and click on the link to read the Handbook.

The Handbook is the intended "next step" from gTLD marketing, as I was learned at ICANN79. Thus, the interest generated by ICANN's and the Community's marketing efforts must be maintained. *This will only happen if the Handbook is understandable, readable and easily digestible*. If readers like what they see, and accessing applicant support seems accessible and doable, then the tribes, NGOs, and micro entities may reach out to their lawyers or find one for this purpose.

If the Handbook is not complimentary to ICANN's marketing and does not build on the potential applicants' interest and excitement in the new gTLD program, these groups will simply walk away and all of our marketing and outreach will be lost on them.

Overall, I write because the Handbook is a gateway for organizations around the world, excited by our marketing, to apply for our Applicant Support Program, and right now, it feels like a locked gate. We need to throw open the doors.

We can do these revisions with some basic and well-known changes:

a) Please change the vocabulary, e.g., removing five and six syllable words as they are off-putting, e.g., changing "*5. Applicant Eligibility and Evaluation Criteria*" to "*5. What you need to apply to the Applicant Support Program and how we will look at your application.*"

b) Please separate ideas, e.g., Section *1.3. Objectives of this Handbook*. The first sentence states: *"This ASP handbook was developed to establish the rules for those seeking financial and non-financial support to apply to the New gTLD Program. It is meant to be a step-by-step guide to apply for such support and includes information on application deadlines, criteria, and evaluation."*

Even as an ICANNer, I'm confused about which program the text is discussing: the application for the ASP program, and or the New gTLD application that an ASP-recipient might submit?

How about some revisions, e.g., Section *1.3 Goals for this Handbook. We wrote this Handbook to help you apply for the Applicant Support Program. The Applicant Support Program is intended for Indigenous Peoples and Tribes, nonprofits, NGOs and charitable organizations, and micro or small sized business providing social benefit or public good. If you are accepted, you will receive:*
   a. *Lower fees for your New gTLD applications, and*
   b. *Advice and guidance as you prepare your New gTLD applications and plan to become a successful gTLD Registry."*

It takes some time for us to review your application to the Applicant Support Program, so please apply as soon as possible. We open for Applicant Support Applications on [date] and you can submit your application here, [website].

Please learn more about ICANN's New gTLD Program on our website [with links to New gTLD materials prepared by Marketing and Communications]. Note: The current wording sends everyone to the IRT, and even ICANNers who are not in the IRT have difficulty understanding this material.

c) Let's make the Figures clearer, larger, and more readable. Figure 2, for example, should be divided into two figures with much larger print and more accessible text.

d) Additionally, let's include checklists and summaries, as all good guides include.

With similar changes throughout the document, and a clear idea of our audience for this document, we will have a Handbook that continues to engage and guide those seeking to apply for the Applicant Support Program.

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Thank you for reading this letter. For several years, I have taught talented LLM (Masters of Law) student from many countries in my *Internet Technology & Governance for Lawyers* class. These suggestions are based on that work.

A scrub by ICANN Communications is just what this Handbook needs!

Best regards,

Kathryn Kleiman