



November 20, 2013

Internet Corporation for Assigned Names and Numbers

Via e-mail: newgtld@icann.org

Dear ICANN:

Attached here is Donuts' comments regarding Community Priority Evaluation for the .TENNIS string.

Thank you for your review of our input, and for forwarding this document to the evaluation panel.

Sincerely,

Donuts Inc.

**Tennis Australia Application for .TENNIS:
Comment to Community Priority Evaluation**

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INTRODUCTION

The Community Priority Evaluation ("CPE") is a serious undertaking. While it protects communities and their names, a "successful" CPE also disqualifies applicants that otherwise have met the rigorous criteria to obtain a top-level domain:

[A] qualified community application eliminates all directly contending standard applications, regardless of how well qualified the latter may be. This is a fundamental reason for very stringent requirements for qualification of a community-based application.

Applicant Guidebook ("Guidebook" or "AGB") § 4.2.3 at 4-9. Accordingly, ICANN created scoring to "identify qualified community-based applications," while preventing "false positives" -- *i.e.*, "awarding undue priority to an application that refers to a 'community' construed merely to get a sought-after generic word as a gTLD string." *Id.*

To obtain community priority, an application must score 14 out of 16 possible points. *Id.* at 4-10. "In cases of generic words submitted as community based strings, test runs by [ICANN] staff show that the threshold is difficult to attain" See <http://www.icann.org/en/topics/new-gtlds/agv1-analysis-public-comments-18feb09-en.pdf>. The objective analysis below demonstrates that the Tennis Australia application for .TENNIS does not meet the criteria to garner the 14 points necessary to "win" the CPE and disqualify the other applicants.

The application suffers from fatal flaws that readily disqualify it from consideration as a community TLD. While the examination should cover all four criteria of the test (because the application is likely to lose additional points), it ultimately need not. The application indisputably must lose all four points when measured against the Nexus and Uniqueness criteria, and two to three more in the Support and Opposition analysis, even before considering the remaining standards.

The applicant claims the label TENNIS for a community that its application expressly limits to the Australian Tennis community, excluding the rest of the global tennis community. This it cannot do, by the letter and intent of the Policy that created the "community" TLD.

The Guidebook even presents the string .TENNIS as its example of improper over-reaching. The AGB states clearly that an applicant for .TENNIS that represents only a local community cannot earn any of the four Nexus/Uniqueness points. Otherwise, the applicant could potentially obtain, from its geographically limited base, what would amount to a global monopoly over the generic term. While the Australian tennis community defined by the applicant may be large, ostensibly representing an entire country, it still comprises a relatively small fraction of global interests in tennis.

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It comes as no surprise that such a local interest therefore is not permitted to co-opt a term with a world-wide constituency. The community TLD was created to protect the labels of real, well-defined communities. Tennis-Australia cannot co-opt the label “tennis” for the exclusive use of a minority fraction of the world’s tennis population. That would be an absurd result, obviously incongruous with the intent and design of the new gTLD program.

The application also clearly loses points when measured against the Support and Opposition criteria. The flaws and consequences resemble those under the Nexus and Uniqueness test described above.

To gain two points in Support, the application must have backing by a majority the broad community – as defined by the string, not by the applicant. In this case, that means the global tennis community, not merely the Australian tennis community.

The growing number that oppose the application point out that an Australian organization should not be awarded a string with global implications. The application loses at least two points in the evaluation against the Support and Opposition criteria.

Other areas of the application might garner more of the remaining points. However, the loss of four points in Nexus and Uniqueness and at least two points in Support renders the remaining questions moot.

The applicant undertakes the CPE essentially as a low cost, high reward gamble. It tries inappropriately to use the CPE to circumvent the appropriate contention set resolution process defined by ICANN.

This does not diminish the subject application. Indeed, it appears capably executed. It simply does not meet the community criteria. As defined by the applicant, the gTLD name .TENNIS over reaches. A local community, even one the size of a country, cannot use the CPE to claim a global name and exclude the rest of the tennis world.

ANALYSIS

The Guidebook allows the CPE panel to award up to four points in each of four categories (maximum points in parentheses):

- "Community establishment," which involves "delineation" (2) and "extension" (2), AGB at 4-10 *et seq.*;
- "Nexus," meaning both “nexus” (3) and "uniqueness" (1), *id.* at 4-12 *et seq.*;
- "Registration policies," consisting of "eligibility" (1), "name selection" (1), "content and use" (1) and "enforcement" (1), *id.* at 4-14 *et seq.*; and
- "Community endorsement," which considers "support" (2) and "opposition" (2), *id.* at 4-18 *et seq.*

Applying the standards established by ICANN for these criteria, and giving Tennis Australia the benefit of all doubts on each, its application attains approximately eight of the 16 available points. More importantly, it receives zero for Nexus – there can be no other conclusion given the clear examples in the AGB. Nor can one dispute that the application must also lose points in the Support and Opposition analysis.

Because the “nexus” and “support” categories themselves dispose of the instant community application, the analysis below addresses them first, even though the Guidebook list them as the second and fourth criteria, respectively. The panel need not consider the first “community” and third “registration policy” standards; however, this analysis nevertheless is included in the final two sections.

CRITERION 2: The Tennis Australia application matches the AGB example of an application that scores zero points for the nexus and uniqueness tests; the application of the local Australia tennis community does not establish sufficient "nexus" with the globally used label, “tennis.”

Criterion 2 requires a "nexus" between the asserted community and the applied-for string. AGB at 4-12. The test consists of a "nexus" factor, worth zero, two or three points, and a "uniqueness" score of zero to one.

The application does not show that the claimed community, if it exists, goes by the specific name "TENNIS" in the same sense that, for example, the "Navajo" and "Boy Scout" communities go by those precise names. Therefore, this application cannot score three points for uniqueness.

Moreover, the applicant is a local organization seeking a globally used label: “tennis.” Such an application must score zero points, even if the “Tennis Australia” organization is globally known.

Finally, according to the AGB, if an application scores zero for Nexus, it must also score zero for uniqueness.

Tennis Australia Overreaches in its Use of the <.TENNIS> String as its Community Identifier.

The Guidebook scores "nexus" as follows:

- For a score of 3: The string matches the name of the community or is a well-known short-form or abbreviation of the community name;
- For a score of 2: String identifies the community, but does not qualify for a score of 3; and
- For a score of 0: String nexus does not fulfill the requirements for a score of 2.

AGB § 4.2.3.

Even to achieve a score of 2, the applied-for string should "closely describe the community or the community members, without over-reaching substantially beyond the community." *Id.* at 4-13. "If the string appears *excessively broad* (such as, for example, a globally well-known but local tennis club applying for ".TENNIS") then it would **not** qualify for a 2." *Id.* (emphases added).

This is *exactly* the case here, right down to the name of the applied-for string. "The mission/purpose of the TLD, ... is to provide a dedicated, distinctive namespace that enhances the *Australian* tennis community's online presence and supports interactivity, engagement, the availability of authoritative information and promotion of the activities of the *Australian* tennis community." Applic. § 20(e)

Tennis Australia describes its "community" as "comprised of the eight Australian state- and territory-based Member Associations." Applic. § 20(b). The application presents these eight participants as if comprising the entire tennis "community." But they do not. These entities might make up an *Australian* tennis community,¹ but not a global one inclusive of the many tennis organizations, tournaments, professional leagues, players, equipment manufacturers, and others immersed in the worldwide tennis community.

The purpose for the prohibition described in the AGB is example is clear. A local community should not "trump" the rest of the global participants in that recreational area in the first round of the new gTLD program. The registration restrictions make it clear that only members in an Australia association can register names in their proposed TLD. The local Australia tennis community should not be able to claim the "tennis" label as its own and exclude the rest of the global participants.

The community preference in the new gTLD program seeks to protect the label of well-delineated communities. It does not exclude the rightful participation of others in that community. Had this applicant selected .TENNIS-AUSTRALIA, it might have met the AGB criteria to score points in this area. However, it made a well-reasoned decision to apply for the broad, well-known term, "tennis." By doing so, the applicant opted for the more commercially feasible, easily remembered label, but forfeited the right to a preference over other applicants who would operate the TLD in a more open manner. The applicant does not have the right, by its claim of "community," to exclude *bona fide* participants in "tennis" who happen to belong to the thousands of long-standing tennis organizations around the world.

¹ We say "might" because even a .tennis-australia application would have to satisfy the delineation criteria and show that the eight organizations selected by the applicant "cover the Australian field." This panel need not undertake that examination here, as the applicant seeks the global term "tennis" and not "tennis-australia," as more fitted to its local group.

Even beyond this straightforward application of the AGB illustrative example, the application defines the relationship between the .TENNIS string and the community identified by applicant as “tennis” is the name of an activity which is enjoyed by many throughout the world, and an industry in which a diverse group participates.” Yet the applicants seeks to obtain the label TENNIS for itself, to the exclusion of the worldwide set of tennis enthusiasts, by identifying the term “tennis” as a *part* of its identity: “The term ‘tennis’ has always been at the core of Tennis Australia’s corporate and legal identity.” Applic. § 20(d).

While one might reasonably find *some* relationship between the label “tennis” and the “Tennis Australia” entity, that relationship cannot earn “nexus” points as the *applicant* has selected an overly broad term. In order to achieve a score of three, a “match” must exist between the community and the label. No such “match” exists between the generic term “tennis,” which involves participants throughout the world, and the applicant’s “eight Australian state-and territory-based Member Associations of Tennis Australia.” Applic. § 20(a). The applicant has cast too wide a net in naming a global area of interest not limited to its own local, national community. The Guidebook has held out a score of 3 for those special cases where a group applies for a name exactly as it describes its community, such as .boy-scouts-of-america or .uk-philately-society.

Nor does the application meet the test for a score of 2. In order to qualify for a 2, the applied-for string should closely describe the community or its members, “without over-reaching substantially beyond the community.” AGB at 4-13. In such a case, the local tennis organization cannot qualify for two points. As the Guidebook expressly states with respect to this precise example, the Tennis Australia application for .TENNIS merits zero out of the three possible “nexus” points. *Id.*

“TENNIS” does not “uniquely” identify the claimed “community.”

A straightforward reading of the scoring rules demonstrates that the Tennis Australia application does not qualify for a “uniqueness” point. The AGB states that: a point for uniqueness requires “that the string does identify the community, i.e., scores 2 or 3 for “Nexus,” in order to be eligible for a score of 1 for “Uniqueness.” AGB § 4.2.3.

Since the Tennis Australia application clearly does not earn two or three points for “nexus,” the rules bar it from consideration for a “uniqueness” point.

Even absent the bright-line definition in the AGB, the Tennis Australia application would not earn a uniqueness point. An applicant can earn a uniqueness score of 1 if the applied-for string has no other significant meaning beyond identifying the community described in the application; a score of zero does not fulfill this requirement. AGB § 4.2.3.

To be an unambiguous identifier, the “ideal” string would have no other associations than to the community in question. This arguably can be achieved by using the community institution abbreviation as string, but

there are other possibilities—for example, by putting a prefix or suffix on a generic string to make it distinctly and uniquely associated with the relevant community (again for example, prefixing "boy" to "scouts" for the community of boy scout organizations, or suffixing "growers" to "apple" for the associations of apple growers).

See <http://www.icann.org/en/topics/new-gtlds/agv1-analysis-public-comments-18feb09-en.pdf>, p.103.

This puts the necessary balancing in the hands of applicants. Does an applicant select a popular, well-recognized term that does not uniquely identify a community, such as .SCOUTS or .SCOUTING? Or does the applicant select its own unique name, such as .BOYSCOUTSOFAMERICA? Or, more apt here, .TENNIS or .TENNIS-AUSTRALIA?

“Uniqueness’ relates to the meaning of the string.” See <http://www.icann.org/en/topics/new-gtlds/summary-analysis-agv3-15feb10-en.pdf>, p.65. Therefore, the analysis must focus on the meaning (more accurately, meanings) of the word “tennis.” Is it the unique name of the community created by the applicant? No. The “community” created by the applicant is the *Australia* tennis community. The term “tennis,” standing on its own, is applicable to a much greater number of adherents, participants and supporters: the global set of tennis players, spectators, industrialists and others. In the case of this application, Tennis Australia adopts the term “tennis” that has long been established in many countries, and thus fails the “uniqueness” standard.

As stated above, evidence of common use of the term "tennis" may make the term an excellent choice for a top-level domain. However, its ubiquity betrays the applicant’s claim to a label uniquely matched to its discrete and relatively small community. Tennis Australia had to choose between a well-known, broadly used term and a string unique to its specific segment, and chose the former. While this may have been a wise business decision, it sacrificed Tennis Australia’s ability to achieve points in nexus and uniqueness necessary to carry the day as a community-designated applicant.

Of the four total points available for "nexus," the AGB, by standard and illustrated example, indicates clearly that the subject application earns zero points out of four. Since this means that the applicant cannot possibly receive the necessary 14 of the 16 possible points to pass the CPE, the panel, arguably, need read no further. Indeed, the further considerations discussed below only demonstrate that the application must lose a significant number of additional points, which merely reinforces the application’s failure to achieve community status.

CRITERION 4: The Tennis Australia application does not have support from a majority of the global tennis “community,” and comments in opposition protest the attempt of the Australian organization to capture the globally used label.

The “support” criterion actually looks at both support and opposition, eligible for two points each, in determining whether to award up to four points to an application. The instant application cannot qualify for two points in either the support or opposition subcategories.

The applicant does not have the global support that it must.

For “support,” the applicant must demonstrate that:

- It is, or has documented support from, the recognized community institution(s)/member organization(s) or has otherwise documented authority to represent the community. It must have documented support from institutions/organizations representing a *majority* of the overall community in order to score 2.
- Documented support from at least one group with relevance may allow a score of 1, but does not suffice for a score of 2.

The AGB goes on to state, “with respect to “Support,” it follows that documented support from, for example, the only national association relevant to a particular community on a national level would score a 2 if the string is clearly oriented to that national level, but only a 1 if the string implicitly addresses similar communities in other nations.” § AGB 4.2.3

Just as with nexus, this guideline is on all fours with the Tennis Australia application. The applicant presents eight supporters from different jurisdictions in Australia. However, the string .TENNIS is not localized to Australia. Despite the definition applied by the applicant, the “string implicitly,” if not overtly, “addresses similar communities in other nations.” *Id.*

The applicant provides eight letters of support: all come from Australian firms. Take the Tennis Australia claim of currently 1.8 million tennis players in Australia. Compare this to estimate of over 25,000,000 players in the US.² The International Tennis Federation has 144 member nations, of which Australia is one. Each has full voting rights in the organization. While these are estimates, even if the actual numbers differ somewhat, or even materially, they demonstrate the large portion of tennis players potentially

² This according to a 2005 USTA and the Tennis Industry Association study. *See also*, http://www.usta.com/About_Us/Organization/News/US_tennis_enjoying_record_surge_in_participation/ (greater number of tennis players in U.S. than the population of Australia).

disenfranchised by the Tennis Australia gambit in the CPE and the lack of majority support for this community application.

Clearly, Tennis Australia's limited local support does not rise to a level representing a majority of the tennis "community." Therefore, its support score cannot exceed one.

In addition, the AGB goes on to state that, for consideration as relevant support, documentation *must contain a description of the process and rationale used in arriving at the expression of support*. Support is not based merely on the number of comments or expressions of support received. AGB § 4.2.3.

The letters submitted on behalf of Tennis Australia lack the requisite *description of the process and rationale used in arriving at the expression of support*. None includes any meaningful description of how it came to support Tennis Australia's application, as required even for a score of one. Rather, all match each other in content. Seven of the eight letters state (essentially word-for-word):

Dear Sir/Madam,

This is a letter of endorsement for a generic Top Level Domain (gTLD) name application dot tennis submitted by Tennis Australia Limited.

[The local organization name] has been involved with Tennis Australia as the Member Association governing tennis in the [Australia State or Territory name], including because Tennis Australia is the national peak body for the sport of tennis in Australia and is the organiser of the Australian Open (one of the four Grand Slams of tennis in the world – the others being Wimbledon, the French Open and the US Open tennis tournaments)

On behalf of [The local organization name] and our affiliated clubs and associations I would like to endorse the gTLD application by Tennis Australia, which would support the wider promotion of the sport to the tennis community.

I also confirm that I am authorised to endorse this application on behalf of my organisation.

Sincerely,

See, <https://gtldresult.icann.org/application-result/applicationstatus/applicationdetails:downloadattachment/104899?t:ac=435>

The similarities go right down to the typographical error where five of the eight supporters omitted the punctuation at the end of the second paragraph. While the last sentence in each letter implies there might have been some process of group endorsement, the "cookie cutter" nature of the letters clearly indicate that no deliberation or development of rationale took place when each organization considered whether and how (with what words) to endorse the application. The AGB criteria are set out to ensure that endorsement is a serious, thoughtful process. That is why the AGB

requires a *description of the process and rationale used in arriving at the expression of support.*

Lacking support by a majority of the tennis-playing community and the requisite indicia of process and rationale for developing the support that exists, the Tennis Australia should receive zero, and certainly no more than one, out of two points in this area.

Opposition affirms that Tennis Australia does not represent global tennis interests.

On the opposition side, an application will earn two points where it lacks any opposition of relevance, and one where it has “relevant” opposition from “one group of non-negligible size.” It will be awarded no points in the case of “relevant opposition from two or more groups of non-negligible size.” *Id.*

The panel should read the current letters of objection. The public comment section for the application has no supporting letters, but does include oppositions that make exactly the same arguments that the AGB describes: that an organization from one country and limiting the use of a TLD to one country cannot claim a “community right” to a globally employed term, tennis.

Again, this makes no value judgment regarding Tennis Australia’s effort in preparing its application and supplementary materials. We would expect it exceedingly difficult to gain the appropriate support required from the large, unbounded community that Tennis Australia implicitly creates. This is why the CPE are set so high—to prevent the creation of artificial communities in order to gain an advantage in the new gTLD process. Thus, regardless of Tennis Australia’s qualifications to operate a registry generally, its application cannot earn more than one out of four Support and Opposition points in this critical area.

CRITERION 1: The Tennis Australia application does not "establish" a "community," which requires more than just a commonality of interests.

A "community" as described in the Guidebook "impl[ies] more cohesion than a mere commonality of interest." AGB at 4-11. As such, the Guidebook calls for examining the claimed community in terms of its "delineation" and "extension." The test for “delineation” considers:

- the “level of public recognition of the group as a community,”
- the existence of “formal boundaries around the community” and “what persons or entities ... form” it,
- whether the alleged community pre-dates the commencement of the new gTLD program in 2007, and
- the level of “organization” of the community through at least one dedicated entity with documented evidence of community activities.

AGB at 4-11. “Extension” relates to “the dimensions of the community, regarding its number of members, geographical reach, and foreseeable activity lifetime” *Id.*

The “community” identified by Tennis Australia in its application consists of members of eight Australian tennis supporting organizations. While this definition provides clarity, it does not necessarily define a community clearly under Guidebook standards.

The member tennis organizations demonstrate a commonality of purpose but not the requisite cohesion.

The application does not necessarily convey the required sense of community, unity of purpose or cohesion. Instead, “Tennis Australia” combines eight state or territorial tennis organizations. While many of these organizations *might* combine when required to serve a common interest, the CPE requires more than just this.

As stated, “community” implies “more of cohesion” than a “mere commonality of interest.” The dictionary defines “cohesion” as “the act or state of cohering; tendency to unite, ‘to stick together.’” AGB at 4-11.

The Tennis Australia application does not demonstrate any “cohesion” among those who engage (beyond the Australian border) in tennis-related activities where they may or may not directly or indirectly deal with one another. Those engaged in tennis may combine from time to time, but they do not “tend to stick together.”

The organizations come together for essentially only a singular event – the Australian Tennis championships. They combine on this effort – this common interest among them. Otherwise, each organization pursues its own agenda. They have a strong set of common interests but none of the trappings of community, in contrast to many of the social and cultural communities that are based in ethnicity (e.g., aboriginal groups), geography (e.g., Irish), or religion (e.g., Islam or Catholicism).

The Tennis Australia application does lay out an organization with bright-line rules for membership, certain population and longevity and deserves a point in this evaluation for that. However, “tennis” is not popularly known as a community – it is merely a popular activity. The application should be award one of two points in the delineation test as the “community” as defined by the applicant is not as well recognized as other iconic community groups.

The limits of the alleged community do not allow an award of both “extension” points.

While Tennis Australia identifies a significant number of members and a history that also suggests activities into the future, its geographical boundaries prevent it from earning two points for “extension.” The applicant appears entitled at most to a single point on this test. When combined with what likewise should be but one point for “delineation,” objective consideration of the application should yield no more than two of the possible four “community” points.

CRITERION 3: The application loses points for registration policies: it imposes vague restrictions on content and use; and its enforcement plan lacks the requisite rigor and formality.

“Registration policies” represent the conditions that the registry will set for prospective registrants – *i.e.*, those desiring to register second-level domains. A community application will receive one point for each of the four following policies:

- Eligibility restricted to community members (a largely unrestricted approach to eligibility receiving zero points);
- Name selection rules consistent with the articulated community based purpose of the applied for gTLD;
- Rules for content and use consistent with the articulated community based purpose of the applied for gTLD; and
- Specific enforcement mechanisms.

Guidebook § 4.2.3.

The panel should score applications from a holistic perspective, applying these categories to the particularities of the community explicitly addressed. The restrictions and corresponding enforcement mechanisms proposed by the applicant should show an alignment with the community-based purpose of the TLD and demonstrate continuing accountability to the community named in the application. *Id.*

The .TENNIS community application does not prescribe name selection rules beyond those associated with premium names. It sets forth essentially no content and use restrictions. The application states that Tennis Australia will employ post-delegation sampling techniques to detect non-compliance and undertake enforcement actions. It provides no other detail, including staffing, budget, detection, enforcement escalation steps, policies, or procedures. These shortcomings eliminate most "registration" points, but even liberal interpretation could yield no higher than three, and more likely two or fewer.

Tennis Australia content and use policies are vague and unenforceable.

As stated above, the AGB requires that there are “rules for content and use consistent with the articulated community based purpose of the applied for gTLD.” The Tennis Australia application states:

the registration policy will state that .tennis domain names must not be used in a manner inconsistent with the mission/purpose of the TLD. The .tennis TLD must also not be used in any way to offer content that is inconsistent with the mission/purpose of the TLD.

Application § Applic.20(e) This quote says two things. First, the policy will be written; however, in this case, it doesn't exist yet, even though the AGB requires these rules as a prerequisite to earning a point.

Second, absent a policy or set of rules, the applicant has merely restated the rules in the negative. The rule for ensuring content and use consistent with the community purpose is to have no content or use inconsistent with the community purpose.

For this test, no point can be awarded because no real work has been done to articulate a set of rules for registrants to follow. By contrast, a clear set of rules describes who can register a domain name in .TENNIS, and articulates what names can be registered. One can argue with whether those rules clearly align themselves with the mission of the proposed registry, and the panel evaluating this case can wrestle with that.

Evaluating against the content and use criteria, however, results in a clear outcome. The applicant has generated no rules. Tennis Australia has merely gainsaid the criteria, repeating them back in the negative. As such, it must lose a point here.

Applicant's enforcement procedures fall short of the detail required to be awarded a point.

Award of a point on enforcement requires *specificity*: investigation practices, penalties, and takedown procedures, "constituting a coherent set with appropriate appeal mechanisms." See AGB at 4-15.

The application does commit to developing and implementing enforcement mechanisms, however, the enforcement program it describes is passive. Registrants must self-warrant that they have complied with the Tennis Australia policies. And, rather than implementing some sort of monitoring mechanism, the applicant proposes that abuses simply be reported to the registry. Applic. §20(e).

Where the application does provide detailed enforcement plans, it does so in reference to Question 28, where ALL applicants must provide anti-abuse measures. This applicant provides measures the same as many non-community TLD applicants sponsored by the same back-end provider.

The current application states that there will be investigations and potentially, takedowns. The application does not describe, with the requisite specificity, any actual investigation practices. In particular, it says nothing about investigations separate from the standard anti-abuse practices required from all applicants.

By the foregoing, Tennis Australia devotes the same effort to combatting the types of abuse and fraud that all registries, community or not, must implement. The applicant does not, however, devote any planning effort toward addressing abuses of the specific "community" restrictions within a .TENNIS gTLD. It has taken steps toward enforcement of registration, content and use restrictions, but not furnished detailed plans.

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This is not to say that Tennis Australia will not enforce its content and use restrictions. If they set out a plan to do so, no reason likely would exist to doubt them. However, Tennis Australia has not furnished the sort of compliance program contemplated in the Guidebook and should not receive a point for this part of the evaluation.

In sum, the application should earn no more than two points in the area of registration policies. It does provide rules concerning registration and naming restrictions. It is for the panel to decide whether they are adequate and sufficiently aligned with the “community” in order to garner points. In stark contrast, the applicant offers no rules or processes around content, use and enforcement, preventing it from obtaining all four, or even three, registration policy points.