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Consideration of public interest in ICANN's "secondary time stamp" announcement

Dear Dr. CROCKER,

At the Paris ICANN meeting in June 2008, the City of Paris announced its intention to create the DotPARIS top-level domain to serve the Paris community. This TLD, which would be operated by the City of Paris, in consultation with public and private community stakeholders, would have a clear focus on the capital of France and its area, and its policies would be both proactive and carefully thought through.

In addition to being the first major world city to declare its intention to apply for and run its own TLD, Paris has focused on digital services for many years. As an example, it has developed a free Wifi access service for public areas and makes extensive use of the Internet to simplify access to city services. Programs such as Open Data Paris give free and open access to the City's library of public data.

The French state has also shown a high level of support for the program. Secretary of State for Forward Planning and Development of the Digital Economy Nathalie KOSCIUSKO-MORIZET met with Rod BECKSTROM in 2012 and highlighted the importance of the new gTLD program for geographic uses such as DotPARIS.

In this context, we note with great concern the absence of any distinction with regards to the public interest in the recent ICANN announcement that a "secondary time stamp" would be used for the new gTLD Program as a way of setting processing priority for the evaluation of gTLD applications.

Some gTLDs will aim to represent the interests of large communities. Many more will primarily serve their applicants' own interests. DotPARIS, like other applications for geographical TLDs, involves not only the City which leads the project, but also the entire community it represents. Paris has a population of 2.3 million and the Greater Paris Area brings together 12 million people.

As the curator of the public resource that is the internet namespace, we feel that ICANN has a responsibility in dealing with the contention between public and private interests. If ICANN fails to take the necessary precautions, it could be years before it even begins evaluating some of the major public-interest gTLD applications, while applications devoid of any sense of public interest may be examined sooner.

We are certain that you share our view that such an outcome would be problematic under any standard of responsible public management.

We therefore call on ICANN to ensure that community-based public-interest geographic gTLD applications are evaluated in the first batch, or given the necessary priority to be approved within a year of the launch of the initial new gTLD application window on January 12, 2012.

Yours truly,

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