

Now ready for submission. Tx to all who contributed and your close and careful review!

NCSG Public Comment: Complete Draft Language for the Next Round Applicant Guidebook
(This is the final Public Comment proceeding on the draft AGB in its entirety.)

Questions:

1) Is the language in [the Introductory Sections and](#) draft Module 1: The Applicant Journey [readable and accessible and consistent](#) with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. [NCSG](#)

a) Answers:

No - If no, please explain (Open-ended response)

The following sections of Module 1 should be updated in compliance with policy or clarified for readability, especially by new applicants:

A. In the “Index by New gTLD Subsequent Procedures Final Report Topic,” pages 8-10, the term “N/A” is used several times, including for Registry System Testing. Why is this the case? If the term N/A is used in this table, then there should be some explanation for it. This will help many people to understand why these entries exist, yet they deemed to be “N/A.”

B. “1.2.1.7 Closed/Exclusive Generic Strings” would benefit greatly from an example. Examples in other areas of the text are worth a thousand words (as .sneeze and .achoo as a replacement string show well).

B. The 1.2.11.5 Code of Conduct Exemption Evaluation needs to be removed, as will be discussed in greater detail in Module 6. The Code of Conduct Exception is not a type of gTLD (as the last draft tried to tell us) and should not have a Panel here. The Code of Conduct exception is clearly a *post-delegation* mechanism following a “good faith effort” by the registry “to get registrars to carry a TLD,” plus the other showings. It is not something we offer to every applicant. To do so would completely disadvantage Registries and Registrants, undermine Specification 9, and dramatically change the DNS system. Accordingly, it does not belong in the AGB.

C. 1.2.11.6.2 Community Registration Policies Evaluation. For clarity, we ask that the term “Community Priority Evaluation” be added to this section because only those truly expert in the process already will know in this introductory section that a Specification 12 will follow a successful CPE, not newcomers. Thus, we request the revision suggested by the capitalization in the following sentence: => “Proposed Community Registration Policies FOR COMMUNITY PRIORITY EVALUATION are also subject to ICANN evaluation and approval before they can be

included in Specification 12 of the Base RA. More information can be found in Community Registration Policies.”

2) Is the language in draft Module 2: Application Submission consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain

There is ongoing Latin Script Diacritic PDP (LD-PDP) discussions and policy development which could affect the New gTLD review and acceptance process, especially related with IDNs and Root Zone Label Generation Rules (RZ-LGR). How will the application process, and this Applicant Guidebook, accommodate the result of LD-PDP in the application submission process? We request that language be inserted in this Module, and as appropriate in other Modules, to provide clear information and guidance.

3) Is the language in draft Module 3: Community Input, Objections, and Appeals consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain

We have a number of concerns about Module 3:

- 1) For clarity, it would be helpful to move the section “3.5.8.1 Objections Filing Window” to earlier in the handbook. A suggestion would be to integrate this information into the “3.5.5 Options in the Event of an Objection” section (starting on p.96).
- 2) Under “3.5.8.11.2 Cooling-off Period,” an explanation here is needed to understand what a cooling-off period is, what it does, and whether one party can submit a request or if it must be a joint request. This information is very important for newcomers to understand.
- 3) The sections on p.103 under “3.5.8.7 Quick Look Review” and p.111 “3.5.9.7 Quick Look Review” both describe what a quick look review is designed to do, but provide very different definitions – “to identify and eliminative objections that are manifestly unfounded and/or an abuse of the right to object” and “to identify and eliminate

appeals that are manifestly unfounded and/or an abuse of the right to appeal.” Please consolidate these definitions or use an alternative term for each stage of the process, as it’s very confusing as it currently stands.

- 4) On p.112, the “‘clearly erroneous’ standard” listed under “3.5.9.9 Appeal Standards” may not be obvious to all readers. We ask that the drafters add a clear definition of this standard to this section.
- 5) Section 3.5.8.5 DRSP Consolidation of Objections, on page 102, and Article 11. Consolidation of Objections, pages 319+, do not capture the early comments of NCSG – comments which were reviewed by, discussed in, and accepted by the SubPro IRT following close review of prior NCSG comments (which we greatly appreciated). Specifically the following changes are consistent with a) earlier comments, b) IRT agreement and c) the changes we strongly request below:
 - A. 3.5.8.5 DRSP Consolidation of Objections, on page 102, should reflect prior comments/agreement of IRT, that no consolidations of objections should be made by the DRSP without **first** giving the parties the right to provide input. This is absolutely standard practice in courts and other arbitration forums, and is necessary for balance and equity, particularly in Community Objections and Limited Public Interest Objections. There may be distinct reasons why it would be materially unfair or counterproductive to consolidate the Objections.
 - B. We note the SubPro already discussed and agreed that a proposal by the DRSP to consolidate the objections would be shared with the parties for input before the decision was made, and not afterwards. To do so creates a much less adversarial relationship between the DRSP and the parties, and the cooperative stance we want to see in an arbitration proceeding.
 - C. We ask that the changes recommended by the NCSG and agreed to by the IRT now be incorporated into the final text of the AGB so that input is collected from the parties **before a DRSP decides to consolidate the Objections.**

6) To:” 3.5.8.12 Application Change Requests in the Objections Process[:] Applicants have the opportunity to request amendments to their applications including, but not limited to, the addition or modification of Registry Voluntary Commitments (RVCs) or community registration policies, in response to concerns raised in an objection, via an ACR.⁹⁶ Absent extraordinary circumstances, ICANN will not be involved in objection processes, and will process ACRs without prejudice or consideration of ongoing objection procedures.”

=> The last sentence does not make sense. If RVCs or revised Community Registration Policies are offered in response to, or as settlement of, an Objections proceeding (particularly a Community Objection or Limited Public Interest Objection), then ICANN cannot avoid considering the ongoing objection proceeding. Nor should an Applicant be allowed to unilaterally change their application while under the scrutiny of an Objection and then throw up their hands and say that the terms of their gTLD have changed completely and render the very expensive and time-consuming Objections proceeding moot. That would be unfair and unjust, and an abuse of process. Accordingly, ACRs that are not merely administrative (e.g., change of address) ***should not be allowed during the course of an Objection absent the approval of all*

parties to the Objection.** Further, ACRs offered to settle an Objection must be shared with the Community – and clearly labeled so the Community knows the context and can comment accordingly. That is a fair, open and public use of the ACR in conjunction with Objection that we ask be formally adopted and incorporated into the final AGB.

4) Is the language in draft Module 4: Contention Set Resolution consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain (Open-ended response)

We have concerns about Module 4, particularly Section 4.4, Community Priority Evaluation:

Substantial and severe changes to the Community Priority Evaluation since the last public comment cause it now to contradict the clear policy recommendations written by SubPro Working Group, and approved by the GNSO Council, ICANN Board and ICANN Community.

In writing these changes, the language of the Community Priority Evaluation (CPE) section generally, and the CPE Evaluation Criteria of Section 4.4.7, in particular, have been stripped of the balance and fairness that the SubPro wrote for them. The many, many changes of these sections since the last version went out to the public must be reversed for the integrity of the process, to not violate the policy recommendations, and to protect the names of well-known names of Communities, Tribal Nations and Indigenous Peoples from being misappropriated by applicants. Misappropriation of well-known community names was a problem envisioned by the SubPro Working Group and specific provisions were added to the recommendations – balances now stripped from the current version for reasons we cannot understand.

To restore the balance and fairness of the SubPro Working Group's CPE policy recommendations, the SubPro IRT must reverse and restore the earlier fairness and balance the CPE language, and particularly the 4.4.7 CPE Criteria/scoring process. Specifically, the IRT to be compliant with SubPro WG's recommendation and the policy adopted by the Council and Board must:

1) Adopt a clear definition of "identified community."

A. This special term – unique to this section is currently not defined, and thus leading to a violation of a promise of the SubPro Working Group: that the rules must be clearly defined and ascertainable. Not left to the imagination of the interpreter, but known to all. This term is not.

B. Further, and by the requirements of the SubPro recommendations, there must be two “identified communities” – one, the identified community of the applicant and two, the identified community that others would see and understand when they look at the proposed gTLD string and the request for Community Priority evaluation. Two different communities are encompassed by this one term, and they must be separated, differentiated, and both recognized and given status and standing in this process.

C. We note that term “identified community” is never used in the SubPro Final Report, and thus, this term and its ambiguity are a product of the IRT process – and there can (and must) be cleared up by the IRT process to make it a) clear and b) give all groups sufficient room to be heard and their interests (and concerns) evaluated.

2) Change the definition of majority to one not dictated by the Applicant, and re-allow the following review and considerations in the following section: “To earn full points, the applicant must demonstrate that a majority of the identified community supports the applicant and that the applicant does not have any relevant opposition. The panel should evaluate the applicant’s evidence on community size to determine whether there is majority support or significant opposition.”

A. The definition of majority must be returned to the majority of the community as decided by the Panel in light of their own research and expertise (as shared with the applicant, but not completely tying their hands from all reasonable inquiry and evaluation of facts, including those outside the application).

B. The Panel must be able to fully and fairly evaluate “majority support” not just within the applicant community, but also considering the thousands (or millions) of members who may be part of communities, tribes and peoples who share this name and consider it their own. Notable opposition must have the full and definitive weight provided to it by the SubPro Working and our adopted and accepted policy.

3) Awarding a New gTLD *without auction* is far too valuable a prize to give to a group that is taking away the name of a much larger, better-known, older community, or group, where clear comments of concern and letters of objection show the unfairness and injustice - that’s the policy we agreed to and we ask that it be reinstated in the final AGB as part of the CPE and its scoring.

A. Further, and as suggested above, we ask that the full intelligence, expertise and independence of the Community Experts conducting the CPE must be restored – and their ability to research and evaluate the claims of the applicant restored just as SubPro Rec 34.21 required: “Recommendation 34.21: If the Community Priority Evaluation Panel conducts independent research while evaluating an application, limitations on this research and additional requirements must apply. The Working Group recommends including the following text in the Applicant Guidebook: “The Community Priority Evaluation Panel may perform independent

research deemed necessary to evaluate the application (the “Limited Research”), provided, however, that the evaluator shall disclose the results of such Limited Research to the applicant and the applicant shall have an opportunity to respond...”

- B. No other limitations must exist and the current ones must be removed to be compliant with policy, including: “The panel is expected to focus its limited research on the fact-checking required to verify information provided by the applicant.”

4) Established Presence in the CPE Scoring was meant to help rank the applicant’s view of itself against how the rest of the world and whether the applicant or another group is the predominant presence. But that has been rewritten by the current version and must be restored to the original balance intended by the policy we adopted.

5) Further, Nexus, was an evaluation and score intended in our policy recommendations to hear, include and weigh comments of concern and letters of opposition.

6) For Established Presence, Nexus, and other scoring, the comments and concerns of the other communities and the rest of the world must clearly weigh heavily and not to be diminished or made optional as the current and new language of the AGP does.

- A. Comments of concern and letters of opposition, by our adopted policy, must have clear and significant weight. By the policy the SubPro WG adopted and the Council and Board approved, the weight is heavy: “Final Report Recommendation 34.19: “Letters of opposition to a community-based application, if any, must be considered in balance with documented support for the application. “Implementation Guidance 34.20: The 2012 Applicant Guidebook includes the following text regarding scoring for CPE Criterion 4-B Opposition: “Opposition: 2= No opposition of relevance; 1= Relevant opposition from one group of non-negligible size; 0= Relevant opposition from two or more groups of non-negligible size.” In listing considerations for determining whether an organization is of “non-negligible [sic] size,” the Evaluation Guidelines should include text indicating that the determination of what is non-negligible [sic] must be relative to the size of the community that that applicant is purporting to serve.” ⇒ The full language of this recommendation must be stored with clear language, and the impact of opposition restored to its full weight (in light of the new 16 point system).

7) These are just a few examples. Since unfortunately the IRT allowed a deep and substantive rewrite of this CPE section, and particularly the Evaluation Criteria/Scoring, in a way that clearly diverges from accepted policy, we ask that the entire section be reviewed closely, revised and rewritten to restore its prior balance and policies

5) Is the language in draft Module 5: Applicant Evaluation Procedures

consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain (Open-ended response)

We have concerns about the 5.1.2.1 New gTLD Program Eligibility Criteria, Section M. Specifically, while we understand that the applicants and individuals named in their Organizational Account Record must be in good corporate standing under their applicable laws and regulations and must be free of Convictions of any crime related to financial or corporate governance.

But a single negative decision by a UDRP Provider like WIPO or the Forum, or an arbitration created in contract by adhesion or a court proceeding between an IP owner and human rights groups on a question of free expression or free speech should not bar an applicant from proceeding. Accordingly, we ask that subsection m be removed as inconsistent with policy, fairness and balance (m. “final determination by a dispute resolution provider or a court of competent jurisdiction of intellectual property infringement relating to registration or use of a domain name by the applicant or any of the individuals named in the Organizational Account Record respectively, within the last 10 years”).

**One loss to an overzealous trademark owner in a UDRP fight or other arbitration or proceeding over free speech and human rights is hardly grounds for keeping a Community or other Applicant from applying for a New gTLD or turning them away on this technicality when they do apply. Section L covers well concerns for cybersquatting and similar systemic issues. Subsection m is not consistent with policy and will cause great and unnecessary harm, and there we ask that it be removed. **

6) Is the language in draft Module 6: String and Application Evaluation Procedures consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain (Open-ended response)

We have several concerns with Module 6:

1) The Section 6.4 Code of Conduct Exemption is inconsistent with ICANN Policy. Specifically:

- A) We have spent inordinate amounts of time creating and defining exceptions to our rules for open gTLDs. .BRAND and .COMMUNITY are the results. The GAC created a similar limitation with the highly-sensitive strings in which access will be limited to those around domain name registrants around the world bound by the regulatory environment suggested by the string, e.g., hotels, attorneys, and casinos.
- B) The policy created by the SubPro Working Group and approved by the Council and Board expressly requires compliance with the Code of Conduct in Specification 9, in the Registry Agreement. This is almost sacred text and it creates critically important rights for registrars and registrants – giving all access to domain names and not creating artificial limits on their registration. Specification 9 is a central part of the Registry Agreement for all.
- C) The SubPro Working Group considered only one exception to the Code of Conduct, namely: *“The Working Group discussed specific circumstances in which it may be appropriate for ICANN to grant Code of Conduct exemptions. In particular the Working Group considered a proposal that if a registry makes a good faith effort to get registrars to carry a TLD, **but is unable to do so after a given period of time, the registry should have the opportunity to seek a Code of Conduct exemption so that it can be its own registrar without needing to maintain separate books and records and legally separate entities.** [stars added]”* SubPro Final Report, page 187.
- D) This CoC Exception does not apply in the AGB processes because the threshold set by the SubPro WG (and the Community 12 years ago) cannot be met by any applicant in the application stage - it’s simply an impossibility. The applicant is coming in anew – and if they are not a .BRAND or .COMMUNITY, then they have **no idea at this early point in time whether or not the registrars will carry their gTLD domain names. ** Accordingly, they cannot possibly meet this exception, and thus the Code of Conduct Exception (and its very odd Panel) should not be allowed as a request - it does not belong as an offer to new applicants in the AGB and Section, 6.4, and its CoD exemption, evaluation and panel should be removed completely. This can take place post-delegation if the necessary criteria are met.

2) Section 6. 6 Variant String Evaluation should be revised to be much clearer for newcomers.

This section is critically important for applicants with Internationalized Domain Names, including Noncommercial Communities, but is very unclear for newcomers to understand. As with other sections, we ask that the IRT define its terms with the section, particularly “variant” itself in the main text, and further, provide a good, clear and useful example of a variant (similar to excellent examples found in other parts of the text).

Then the IRT can reference the additional terms in the Glossary, including Variant String, Variant-string-set and Variant-strings-set. All of these changes will make the section much easier for Newcomers to read and understand.

7) Is the language in draft Module 7: General Information consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT.

a) Answers:

No - If no, please explain (Open-ended response)

The General Information module (currently Module 7) consists of the terms and additional process related with the application process, in a glance. It will help for the Applicant to read all the information from the General Information module, - for example anything related with Universal Acceptance, language of the application, legal compliance, supporting documents required for the applications etc - *before starting the application process* and prepare everything accordingly.

With those rationales, instead of putting this Module almost in the end of the Applicant Guidebook, the General Information would be more helpful for the Applicant when it is located in the beginning of the guidebook. **NCSG strongly recommends the AGB be reformatted to have the information currently in Module 7 follow Module 1.**

8) Is the language in draft Appendix 1: Application Questions consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. **NCSG Question: Is it readable, accessible and understandable?**

a) Answers:

No - If no, please explain (Open-ended response)

We have a number of questions and edits for Appendix 1.

A) Question 33.1.1., “Does the applied-for string fall into a String Category subject to additional mandatory PICs?”, uses the terms “String Category” and “PICs” without adequate explanation or contextual links in Appendix 1. Although “Public Interest Commitments (PICs)” are discussed in Module 6, non-expert applicants may not understand what this implies for their obligations.

B) Question Set 20 on “Financial Projections” refers to templates and methodologies but does not clearly link or point to Appendix 5, which includes the financial projection templates.

C) Questions 34–36 address Registry Voluntary Commitments (RVCs). However, the language does not always clearly distinguish whether answering these questions is required or optional, particularly in contexts where applicants are not making RVCs proactively or reactively.

D) The technical questions in Section 26 (“Registry Services”) assume an understanding of DNSSEC, RDAP, EPP, and Escrow Services with no simplified explanation or glossary links in-line. We ask that this information be added.

9) Is the language in draft Appendix 2: Materials related to Geographic Names consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers: Yes - No - If no, please explain (Open-ended response)

10) Is the language in draft Appendix 3: Objection and Appeal Materials consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers:

No - If no, please explain (Open-ended response)

- A) For clarity, we recommend moving "article 2. Definitions" to module 3 as these definitions are important for understanding and following that section.
- B) As a general note, there is much repetition between this section and Module 3. We encourage the IRT to review and compare these two sections to identify what can be consolidated and/or removed as this is already a very lengthy document. For example, p.102 of Module 3 on the specific qualifications of Panelist(s) provides exactly the same information as what is on p.320.
- C) Similarly, section “3.5.8.7 Quick Look Review” on p.103 and “Article 13. Quick Look Review” p.322 have extensive overlap that could be streamlined and simplified.

11) Is the language in draft Appendix 5: Templates for Standard Financial Profile consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public

Comment or in discussions with the IRT. **NCSG Question: Is it readable, accessible and understandable?**

a) Answers: Yes - **No - If no, please explain (Open-ended response)**

12) Is the language in draft Appendix 6: Predictability Framework consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers: **No - If no, please explain (Open-ended response)**

TS - The section does look readable, accessible and understandable to me.

KK - I found something odd that does not make sense to me

We have a few Questions and Concerns about Appendix 6. Specifically:

A) There is a section of the Predictability Framework that does not make sense to us. In A6.3.2 Change Execution, the first part states: “The Change Execution flow chart documents three primary scenarios for Program modifications: 1. When ICANN org determines that a required change can be implemented in alignment with the existing Board-approved policy recommendations and will not have a material impact on applicants,²⁴¹ it is classified as a ‘minor operational change.’ Footnote 241 states: “For reference, the definitions of a non-material change and a material change are defined in section Application Change Requests Overview.”

But **material and non-material changes in applications, under the rules of the AGB,** have nothing to do with **material and non-material changes in rules for the AGB.** They are apples and oranges. We ask the IRT to write a different footnote/explanation, and provide a clear illustration in a footnote, to help everyone understand clearly what is a material change rising to the level of policy.

B) Further, in the draft ABG section below, we fear the section is missing the most important part of the recommendation of the SubPro Working Group.

In the draft AGB section: “When ICANN org determines that the required change cannot be implemented in alignment with the existing Board-approved policy recommendations, ICANN org will inform the SPIRT. The SPIRT will then confer with the GNSO Council. Should the GNSO Council determine that an alternative change, which does not require a change of existing policy, cannot be found, the change is considered a ‘policy change’ and the subsequent steps in the change execution flow chart will be followed.²⁴²”

But In its Final Report after extensive debate on this subject, the SubPro PDP WG wrote: “The Predictability Framework is principally:

- A framework for analyzing the type/scope/context of an issue and if already known, the proposed or required Program change, to assist in determining the impact of the change and the process/mechanism that should be followed to address the issue. The framework is therefore a tool to help the community understand how an issue should be addressed as opposed to determining what the solution to the issue should be; the framework is not a mechanism to develop policy.” SubPro Final Report, p. 16.

Nowhere in the draft AGB paragraph above, or any section, do we see this critical limitation of the SPIRT carefully and clearly laid out. We recommend and request that to this part of the AGB, the very clear words be added: ****The SPIRT “is not a mechanism to develop policy.”****
Everyone should know: now, tomorrow, and in two decades.

14) Is the language in draft Appendix 8: Code of Conduct and Conflict of Interest Guidelines for Service Providers consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers: Yes - **No - If no, please explain (Open-ended response)**

15) Is the language in draft Appendix 9: New gTLD Program: Next Round Privacy Policy consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers: Yes - **No - If no, please explain (Open-ended response)**

16) Is the language in draft Appendix 10: Terms and Conditions consistent with Board-approved recommendations, and are the concepts introduced therein consistent across the AGB? Please note that comments should be made on issues that have not been previously addressed via Public Comment or in discussions with the IRT. NCSG Question: Is it readable, accessible and understandable?

a) Answers: Yes - **No - If no, please explain (Open-ended response)**

Other

Do you have some other comments that need to be added and don't fit into a single section. Please put them here:

[open for input]

Our Organizing Materials

Here's the [link](#) to the proposed Applicant Guidebook (AGB) now out for public comment.

Here's a link to our NCSG Draft Comment, based on the questions we have available in the Public Comment -

https://docs.google.com/document/d/1TILFixIDM_JrAsEx5sfAnxGc9XDlo43CpudzXCYhJCY/edit?usp=sharing

Below we have our table dividing up the 400 pages by Modules and Appendices that everyone can review. I've divided up the sections in the table among us – what do you think? **Feel free to swap, divide up a section, or take additional sections by editing the table in our NCSG Draft Comment.**

Person	Section	We agree?	Completed
Benjamin	Introductory Sections (p. 1-24) Esp. Preamble & Exec. Summary		
Wale Namra Sarah	Module 1: Applicant Journey (p. 25-48)		
Juliana Amin	Module 2: Application Submission (p. 49-79)		
Michaela Pedro Kathy	Module 3: Community Input, Objections, and Appeals (p. 80-119)		
Kathy & Everyone Interested (huge problems with Community Priority Evaluation (CPE)). Please	Module 4: Contention Set Resolution (p. 120-155)		

let me know if you want to review!			
Emmanuel	Module 5: Applicant Evaluation Procedures (p. 156-165)		
Pedro - who else would like to take a look at this huge section?	Module 6: String and Application Evaluation Procedures (p. 166–224)		
Juliana	Module 7: General Information (p. 225-232)		
Emmanuel Juliana Frank Gbeere	Appendix 1: Application Questions (p. 233-303). <i>It's crazy how many there are!</i>		
Amin	Appendix 2: Materials related to Geographic Names (p. 304-313)		
Kathy Michaela	Appendix 3: Objection and Appeal Materials (p. 314-339)		
Who likes Financial Forms?	Appendix 5: Templates for Standard Financial Profile (p. 341-345)		

Tomslin Manju	Appendix 6: Predictability Framework (p .346-355)		
Yao Pedro Manju	Appendix 8: Code of Conduct and Conflict of Interest Guidelines for Service Providers (p. 356-361)		
Farzi Michaela	Appendix 9: New gTLD Program: Next Round Privacy Policy (p. 362-377)		
GLOSSARY	PAGE 380		

Best and tx,

Kathy (with Pedro also available for anyone who would like assistance on their review)