

Independent Objectors

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Overview

The New gTLD Program: 2026 Round (2026 Round) includes an objection process, which affords certain parties an opportunity to advance arguments against identified applications for new gTLDs on different grounds. Objections may also be filed by Independent Objectors (IOs), who do not act on behalf of any particular persons or entities, but solely in the best interests of the public who use the global Internet. To mitigate possible conflict of interest issues that may arise from having a single panelist serving as the IO, there is a standing panel of three IOs, one of whom acts as the chair.

Scope of Work

IOs may file objections against highly objectionable applications only on the following grounds:

- Limited Public Interest: Based on the claim that the applied-for string and/or one or more applied-for allocatable variant string(s) is contrary to generally accepted legal norms of morality and public order that are recognized under principles of international law.
- Community: Based on the claim that there is well-substantiated opposition to an applied-for string and/or one or more applied-for allocatable variant string(s) from a significant portion of the community which the string may be explicitly or implicitly targeting.

Objections and appeals for both grounds are administered by the International Chamber of Commerce (ICC).

ICANN expects the selected Independent Objectors to demonstrate the ability to deliver on the following, among others, in line with the [New gTLD Program: 2026 Round Applicant Guidebook](#) and the [ICC Rules](#):

- Review New gTLD Program: 2026 Round applications.
- Monitor application comments, objections, and other input related to potentially controversial applications.
- Perform research, where necessary.
- Coordinate with the other IOs to ensure any conflicts of interest issues are addressed.
- Coordinate with other IOs and ICANN to ensure that no duplicate objections are filed.
- File Limited Public Interest and Community objections and appeals, where relevant, respecting the specified deadlines and procedures.
- Participate in mediation and settlement processes, where appropriate.
- Develop detailed rationales outlining the reasons why each objection was filed for publication on the New gTLD Program's website.
- Engage with the applicant and the Dispute Resolution Service Provider (DRSP) in case of requests for a three-person panel and/or consolidation of objections.
- Provide any additional written statements and/or evidence to the DRSP/Panel as required according to the relevant procedures.
- Participate in virtual hearings where applicable.
- Communicate with ICANN on a regular basis on issues and updates.

Besides the above, the selected chair will be responsible for the overall coordination of the IOs' work. Such work includes but is not limited to:

- Ensuring that any conflicts of interest concerns are addressed in a timely manner in line with ICANN's [Conflicts of Interest](#) and [Code of Conduct and Conflict of Interest Guidelines for Service Providers](#) for the 2026 Round provided in the Applicant Guidebook.
- Ensuring that no duplicate objections are filed.

ICC will provide the IOs access to the objections filed prior to the Administrative Review, to ensure they are able to review objections before the relevant deadlines. The IOs shall treat all such information as strictly confidential and shall not disclose it to any third party. Each IO will have access to all the objections, except those where a stated COI prevents review by an IO. ICANN will not be involved in the reviews.

The objection filing window for objections lodged by IOs will begin at the same time as all other parties, on String Confirmation Day, but will be open for seven additional days beyond the end of the objection filing window for the general public. String Confirmation Day is expected to be in November 2026, and the filing window for IOs will stay open for 111 calendar days. IOs will only file objections during the initial objection filing window. Should their objection not prevail, IOs may appeal the Panel Determination. IOs may also be involved in mediation and settlement with affected applicants, where appropriate.

IOs will also need to provide rationales outlining why each objection was filed, based on a template provided by ICANN; since such rationales will be published, IOs should not include any confidential information. The IO chair will send all rationales to ICANN at 26r-objections-appeals@icann.org within 7 days of the closing of the objection filing window for IOs. ICANN will post the rationales to the website as soon as feasible after DRSPs have concluded the Administrative Review for all objections.

The IOs:

- Shall not object to an application unless at least one comment opposing the application has been made in the public sphere, in light of the public interest goal.
- Will not have their objection considered if another objection on the same ground has passed the Quick Look Review, absent extraordinary circumstances.
- Must consider application comments when making an independent assessment whether an objection is warranted. The IOs will have access to application comments received during the comment period.

Extraordinary Circumstances

IOs will not have their objection considered if another objection on the same ground has passed the Quick Look Review, absent extraordinary circumstances. Such extraordinary circumstances include, but are not limited to¹:

- Scope
 - The Independent Objector does not believe that the scope of the objection that has already been filed is the same as their objection despite it being on the same ground.
 - The original objection is too narrow in scope.
- New elements
 - The Independent Objector has material evidence or arguments that were not raised in the original objection.
 - Material changes were proposed to the application after the original objection was filed that may raise additional concerns.
- Bona fide
 - The Independent Objector believes that the objection that has been filed is spurious despite meeting the criteria for passing the Quick Look Review.
 - The Independent Objector believes that the objection may not have been filed in bona fide, e.g. with the sole purpose of preventing the Independent Objector from filing an objection against the relevant application.

If an IO believes that an application should not proceed in light of public interest concerns, and an objection on the same ground for that application was already filed, they should lodge an objection nonetheless if they believe that extraordinary circumstances apply, including a detailed rationale outlining their reasoning to be part of both their objection and the public rationale. In such cases, all IOs should agree that extraordinary circumstances apply, excluding those IOs that are identified as having a COI. Such extraordinary circumstances will be considered by the Panel as part of its assessment as to whether the IO has standing.

The DRSP will appoint the same Panel to consider both objections and will perform the Quick Look Review on the objection filed by the third party:

1. If the Quick Look Review fails, the Panel will consider the objection lodged by the IO.
2. If the Quick Look Review passes, the Panel will determine whether the extraordinary circumstances described by the IO apply as part of the assessment as to whether the IO has standing.

¹ The list is not comprehensive.

Conflicts of Interest

ICANN designed guidelines to ensure that all service providers operate with integrity, impartiality, and transparency. All service providers, including IOs, must comply with [ICANN's](#) and the Program's Conflicts of Interest (COI) policies as described in [Appendix 7](#) and [Appendix 8](#) of the 2026 Round Applicant Guidebook.

As Part of the Contracting Process

The Contractor Conflicts of Interest Disclosure Form has the objective to facilitate compliance with disclosure obligations described in ICANN's Conflicts of Interest Policy. The form helps ICANN to identify potential or actual COI involving business and family relationships between ICANN, its directors, liaisons, officers, employees, and contractors.

1. IOs must fill in the form and send it to ICANN's contact person.
2. ICANN will review the form to make sure the responses align with its existing COI policies and guidelines.
3. If there are any material changes during the current year in the information provided in the form, IOs should promptly notify ICANN.
4. IOs must agree to revise and update the form whenever circumstances require such revisions, and, at a minimum, on an annual basis.

As of Reveal Day

As of Reveal Day, ICANN will compile a spreadsheet including information on applicants, parent entities, ultimate entities, directors, relevant shareholders, executives and other pertinent information for all applications published on the TLD Application Management System. The objective of the spreadsheet is to enable IOs to identify applicants for which they may have an actual, potential or perceived COI (for the sake of brevity, referred to simply as "COI" in this section). If the IO identifies a COI, the affected IO will not review any applications submitted by that applicant, nor any applications that are, or the IOs determine may become, part of a contention set with applications submitted by that applicant.

1. As soon as feasible after Reveal Day, ICANN will share the spreadsheet with the IOs. IOs will review the spreadsheet and notify the IO chair of any identified COI.
2. The IO chair will compile the information in the spreadsheet and send it to an email address designated by ICANN within 15 days of Reveal Day.
3. The IO chair will ensure that all IOs are informed of all reported COI to ensure that applications are reviewed appropriately. If one of IOs is conflicted, the IO chair will ensure that another IO is assigned to handle the objections for that application and other applications that are, or the IOs determine may become, part of a contention set with applications submitted by that applicant.
4. If a COI is identified or arises following the filing of an objection or appeal, the IO chair will appoint another IO to be responsible for the impacted objection or appeal. The IO chair will promptly notify ICANN and the DRSP of the conflict and the change.

Fees and Budget

The IOs' funds comprise two separate elements, both of which are funded from the proceeds of new gTLD applications:

1. The **IO's fees**, i.e. the fees paid to the IOs for performing their work. Providers are requested to submit a proposal for their fees using a tiered approach based on the number of applications received. ICANN will make payments to the IOs accordingly.
2. The **IOs' budget**, i.e. the fees paid to the DRSP for processing objections and appeals and managing mediation. IOs will use this budget for filing objections and appeals as well as mediation fees, if applicable. The DRSP will issue invoices to ICANN, which will make payments directly to the DRSP. In extraordinary circumstances, IOs may request additional budget.

Once the number of applications is confirmed and shared with the public, ICANN will inform the IOs on the final IOs' fees, based on the applicable pricing tier, as well as the IOs' budget.

Deliverables

Ongoing

Expected timeframe: November 2026-March 2028

- Escalate any issues that might arise to ICANN
- Ensure any requests by ICC are met within the deadlines
- Ensure that ICANN is informed on any updates, including the filing of objections and appeals and additional costs that may be charged by ICC
- Coordinate with other IOs and meet online on a regular basis
- Support ICANN in addressing any accountability mechanisms described in the Guidebook for evaluation results and to supply necessary information and documentation to ICANN, as needed, on an ongoing basis

In the 104 days following String Confirmation Day

Expected timeframe: November 2026-February 2027

- Review all New gTLD Program: 2026 Round applied-for strings, focusing on applications that may lead to Limited Public Interest and Community objections
- Monitor and analyze comments and objections on such applications, as well as any additional input
- Perform research where necessary
- Start drafting objections and rationales explaining the reason why each objection was filed
- Coordinate with other IOs
- Raise any conflicts of interest issues as soon as possible
- Other administrative tasks
- Chair only: Ensure all conflict of interests issues are addressed in a timely manner in line with ICANN's policies and procedures
- Chair only: Ensure there is no duplication of efforts

In the 7 days following the deadline for the general public to file objections

Expected timeframe: February 2027

- File objections in line with ICC's and ICANN's requirements, ensuring there is no duplication
- Document the rationale for each objection filed in line with ICANN's requirements

- Chair only: Provide ICANN with the list of objections that have been filed and the rationale for each for publication on ICANN's website

Following the deadline for filing objections

Expected timeframe: February-April 2027

- Engage with the applicant and the DRSP in case of requests for a three-person panel and/or consolidation of objections
- Provide any additional written statements and/or evidence to the DRSP/Panel as required
- Participate in virtual hearings where required
- Participate in mediation and settlement processes, where appropriate

Following the issuing of Panel Determinations

Expected timeframe: April 2027-March 2028

- Appeal to Panel Determinations, where appropriate, should objections they have filed not prevail
- Participate in appeal proceedings, should the other party not prevail and elect to appeal the Panel Determination

Additional Information

Application Comment Forum

Application comments, which the Independent Objectors will have to review, will be posted to the so-called "Application Comment Forum" (ACF). The ACF will open on String Confirmation Day, will stay open for the duration of the Program and can be accessed through the [New gTLD Program website](#).

The At-Large Advisory Committee

The At-Large Advisory Committee (ALAC) is the Advisory Committee within ICANN that represents the interests of individual Internet users per Article 12.2(d) of the [ICANN Bylaws](#). The ALAC, as described in its [Procedure for Filing Comments and Objections in the New gTLD Program Next Round](#), is planning to review the submitted applications and file application comments and objections as appropriate. Similarly as for IOs, ICANN offers funding for the ALAC to file objections and appeals to cover costs payable to DRSPs. IOs should note the [Board's response to ALAC Advice](#) from August 2024 concerning the ALAC standing for filing Community objections.

Logistics

[for later]

Reference Materials

IOs will have to abide by:

- The [New gTLD Program: 2026 Applicant Guidebook](#), and in particular:
 - [Section 4.5 Objections and Appeals](#)

- [Appendix 3 Appendix 3 Materials Related to Objections and Appeals](#)
- [Appendix 7 Conflict of Interest](#)
- [Appendix 8 Code of Conduct and Conflict of Interest Guidelines for Service Providers](#)
- [ICC Rules](#)