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Adjoint au Maire de Paris
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The City of Paris has read the 3rd version of the Draft Applicant Guidebook (DAGv3) with great interest and would like to thank ICANN staff for producing this and the accompanying supporting documents.

The DAGv3 includes substantial and useful clarification on the status of geographic names. However, on section 2.1.1.4.1, page 2-12 (clean version), the following text has been added: *"In the event that there is more than one relevant government or public authority for the applied-for gTLD string, the applicant must provide documentation of support or non-objection from all the relevant governments or public authorities."*

The City of Paris is extremely worried with the burden this obligation would place on it as an applicant for .PARIS. Paris was the first city government to declare its intention to apply for a gTLD and this was done in June 2008. The City of Paris has therefore been very transparent about the proposed .PARIS TLD.

When questioned during the Seoul meeting, ICANN staff suggested that section 2.1.1.4.1 of the DAGv3 afforded special consideration for capital city names such as .PARIS. However as it stands, this section of the DAG still seem unclear. The City of Paris urges ICANN to ensure there is maximum clarity for capital cities in this section of the DAG. In particular, that it be explicitly stated that capital cities will only require documentation of support or non-objection from the relevant government or public authority of that country.

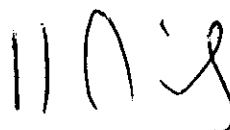
Further, the City of Paris is growing increasingly worried with ICANN's apparent inability to bring the new gTLD process to successful fruition in a timely manner. Prospective applicants such as ourselves have been working on this for several years under the understanding that we would be able to apply for a gTLD in 2009 or early 2010 at the latest. It now appears that further delays are to be expected.

The City of Paris wishes to highlight the problems these delays cause for prospective applicants, who are thereby required to expend considerable resources working to an ever-lengthening timeline. ICANN cannot expect a public authority such as the City of Paris to continue spending public resources on its application for a gTLD if there is no clear commitment from ICANN.

We understand that the latest delays are due to the discovery of newly identified concerns associated with certain types of TLD applications. It is natural that TLD applications subject to such concerns are delayed until a satisfactory solution has been found. However, applications that do not cause any of these concerns must not be delayed. If there is a concern about receiving too many applications, ICANN has the responsibility to divide them into appropriate categories of priority. It is generally accepted that social-purpose, public-interest TLD applications supported by the relevant government authorities should have priority.

The absence of a dependable timeline is putting the .PARIS application (and many others) at risk. We therefore urge ICANN to publish a final version of the Applicant Guidebook in the first quarter of 2010 and start the first round of applications for new gTLDs before the end of the third quarter.

Regards,



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