Request 15-11: Motion Picture Domain Registry Pty Ltd

Supplemental Submission

The Applicant seeks to provide this supplemental submission to address recent information that may be considered by the BGC in their consideration of this Reconsideration Request, namely: a blog by Cyrus Namazi posted on ICANN's website on 11 August 2015—*Resolving the Release of Two Character ASCII Labels with Comments*https://www.icann.org/news/blog/resolving-the-release-of-two-character-ascii-labels-with-comments

This blog is intended to inform interested parties of how ICANN intends to address all previous requests and comments associated with the Authorization Process for the Release of Two-Character ASCII Labels

We respectfully ask that our Reconsideration Request as submitted is considered in accordance with the Authorization Process that was in place at the time we submitted our request on 3 April 2015, rather than in the context of the process outlined in the blog.

While we understand the process has been developed to address the concerns that we have raised in our consideration request, we believe that the process, as outlined, is inconsistent with the process previously published by ICANN and as such it should have no bearing on our Reconsideration Request.

Governments should not be afforded an opportunity to clarify their comments, but rather, those comments as submitted should be evaluated at face value and must be relevant and reasoned.

Motion Picture Domain Registry has already warranted that we will implement measures to avoid confusion with the corresponding country codes pursuant to Section 2 of Specification 5 of the Registry Agreement. We do not believe there is any requirement that these measures be the subject of public comment.

The process, as outlined in the blog, will take an unspecified period of time to complete, but could be in the order of more than six months.

We would note that there is already a disparity among registry operators with regard to those letter/letter combinations that remain reserved. This disparity arises from the process by which the release of letter/letter combinations was sought and the timeframe in which they were submitted. For example, requests approved prior to 30 March 2015, were not subject to a blanket objection submitted by the UK Government for the external territories associated with the country codes of (bm), (io), (ky), (ms), (sh) and (tc). Unfortunately for .film we submitted our request in April and these letter/letter combinations remain reserved. The introduction of a third process associated with the release of letter/letter combinations has the potential to see even more disparity among registry operators emerge.