



AT-LARGE ADVISORY COMMITTEE

EN

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ALAC Statement On Uniform Rapid Suspension System

Introduction
By the Staff of ICANN

The At-Large Advisory Committee endorsed the comment on the Uniform Rapid Suspension System during its meeting at the Chair's request on 9 December 2010 with 10-0 votes and no abstentions.

The comment on the URS was originally submitted to the public consultation process on the Proposed Final Guidebook by Alan Greenberg. Evan Leibovitch then revised the document to add context with regard to the [previously submitted](#) ALAC statement on the applicant guidebook. The second revision (the attached document) contains additional minor changes by Alan Greenberg.

On 10 December 2010, Alan submitted the statement to the public consultation on the Draft Final Guidebook on behalf of the At-Large Advisory Committee.

(End of Introduction)

The original version of this document is the English text available at www.atlarge.icann.org/correspondence. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail

ALAC Statement on Uniform Rapid Suspension

The At-Large Advisory Committee ("ALAC") wishes to add an additional comment on the Proposed Final Applicant Guidebook ("PAG"), to supplement comments already endorsed and submitted as public comment.

Specifically, we wish to formally support both aspects of the comment made by Alan Greenberg regarding the reduction of the URS response time noted in the Uniform Rapid Suspension ("URS") document, listed as an unnumbered addendum to Module 5 (<http://www.icann.org/en/topics/new-gtlds/draft-urs-clean-12nov10-en.pdf>).

Mr. Greenberg's comment exists in the public comment area for Module 5 and may be viewed directly at <http://forum.icann.org/lists/5gtld-base/msg00005.html>

As indicated in our previous statement, we have serious concerns regarding what we consider to be backwards steps from areas of community consensus. As one particularly serious example, we wish to draw attention to proposed URS rules which appear to regress from the position taken by the cross-community Special Trademark Issues ("STI") group and from the Draft Applicant Guidebook version 4.

Although 14 days may be sufficient for large corporate entities, it is not sufficient for registrants who are individuals, small businesses or non-profit organizations -- particularly those located where mail delivery is not as effective as in the US or western Europe. Given that the overall URS process time had been reduced moving from the IRT and staff proposals to that of the STI, there is no call for reverting to the 14 days. When public comments to earlier rules were reviewed, the ICANN staff decision was to not adjust the time period. This decision was presumably based on a few complaints about it being too long, and a larger number about it being too short.

As the STI process was one of ICANN's more successful efforts to bring compromise to what were initially VERY opposing positions, it is disturbing to have the Board micro-manage the issue at this level and late date.