

**NTAG**  
New TLD Applicant Group

June 25, 2014

Mr Akram Atallah  
President, Global Domains Division  
ICANN

VIA E-MAIL

Dear Akram:

We write regarding the ICANN name collision proposal announced at the London meeting. While we and/or individual applicants may take a more detailed position on some of the requirements, we wanted to alert you right away to one issue with the proposal.

The ICANN proposal presented to the NGPC for approval includes a requirement that no names may be registered or sold until 90 days after the date the TLD is delegated.

As such, new TLDs may no longer take the so-called alternative path, which permitted registries to launch and register second-level names, but hold back a list of second-level names. As under the new proposal registries may not sell names for a 90-day period, we request a waiver of ICANN fees for the same 90 day period for such implicated registries. In other words, ICANN fees should start to accrue for such registries one quarter after the delegation date, as opposed to on the delegation date.

We believe that such a waiver would be a fair outcome to this inequity.

Sincerely,

The NTAG  
c/o Andrew Merriam, Secretary