

## **Response to the NCDNHC**

The DotOrg Foundation (DOF) appreciates the hard work and dedication of the NCDNHC team in reviewing the eleven applications and striving to assign values to the answers. We are puzzled, however, by a number of the conclusions drawn by the team, as well as some of the gaps in the team's evaluation where they evidently missed or misconstrued our application and our answers to their supplemental questions. In an effort to provide clarity as the ICANN staff prepares a final recommendation to the ICANN Board, please accept our clarifications and corrections below that strive to address concerns in the NCDNHC report.

### **NCDNHC Page 9: Belief that DOF's application lacks market research:**

For this bid, Registry Advantage engaged a marketing research team to analyze the current .org registrant base. Our answers to question C38 and the section of question C35 dealing with new products were based on this analysis.

The analysis was largely based on bulk Whois data information of the five largest ICANN-Accredited Registrars (as measured by share of .com, .net, and .org registrations under management as of March 31, 2002, by the Snapnames, State of the Domain Report, April 23, 2002).

We believe that this data provides a good sampling of the general characteristics of the .org registrant base, and therefore valid market research on which to base preliminary plans. If we were to be awarded the .org bid, as we have stated in our proposal, we would want to continue market research and consult with .org stakeholders (including registrars, registrants and the noncommercial sector) in order to finalize our plans.

### **NCDNHC Pages 9 and 10: NCDNHC Comments on Validation:**

The NCDNHC's overview makes clear the reviewers' skepticism – and we believe, misunderstanding – of the benefit of coupling validation services with the registry. The DotOrg Foundation wishes to explain the concept and process more clearly.

The DotOrg Foundation has proposed the creation of two innovative products that provide practical and demonstrable benefits to noncommercial organizations - the DotOrg Directory and the validation framework. Both are detailed in our proposal and in responses to NCDNHC supplemental questions. We have also attached a copy of the White Paper on Validation that we submitted to ICANN and NCDNHC in Appendix A of this document.

While validation clearly can be done outside the registry, we and our supporters in the noncommercial community believe that the registry is the cornerstone to creating a far more effective validation system. At the same time, validation offers the registry the best and most cost-effective way of expanding its draw of noncommercial registrants. Quite simply, our proposal to link the registry to a powerful and easily accessible validation system is appealing to the noncommercial community and good for future growth of the noncommercial base of the registry.

As we explain in greater detail in the attached White Paper on Validation, using the registry as a platform will improve upon current disparate sources of validation by i) offering noncommercial organizations one-stop access to a variety of validators, ii) providing them with a single communication toolkit to connect to validators around the world, iii) presenting validated information on many organizations in a single, easily comparable format, iv) providing public access to a single Directory of validated information about a variety of organizations, and v) disseminating this validation information broadly to the public by using existing distribution channels. The combination

of these various benefits – convenience, transparency, choice, and distribution – makes validation more useful to both organizations and the public. There currently does not exist any other comparable resource that has the potential to multiply the effectiveness of the Internet for the noncommercial community.

As the NCDNHC report astutely noted, “validation and seal program require achievement of a significant critical mass of buyers and widespread understanding among the user public before it can improve trust...” The Foundation will use existing distribution channels in the noncommercial marketplace and its network of registrars to build critical mass. For validation to be effective, it must have powerful distribution channels both to the public and to the noncommercial community – the registry has the potential to have both.

While we strongly believe in the validation concept, particularly after our discussions in the nonprofit community (please see our support letters for some examples of the endorsement for this service), we recognize that any good idea presents some risks and concerns. We have attempted to tackle those we know, as follows, and will continue to consult with the noncommercial community prior to launching the validation platform:

- Validation is completely optional: no registrant need participate; no registrar must offer it; and any participating registrant may choose which information to make public by choosing the appropriate validator.
- Validation is not limited to non-profits, which is the more traditional approach. We aim to provide an open marketplace for any type of validation for noncommercial sites. In addition to attracting existing validators to a single marketplace, our platform may foster future validators of corporate good-will or philanthropy sites, and any other sector of the noncommercial community.
- Validation is a service for the noncommercial community, not a gatekeeper into the community. These validations are done to add credibility to the organization that chooses to participate, not to validate its right to be a .org. In no circumstance will validation be necessary for obtaining or owning a .org domain and no preference will be given to validated organizations over non-validated organization in terms of obtaining a .org domain.

By linking registration of a .org domain name to validation and a directory, we will brand the .org as a "must have" for any noncommercial organization that uses validation to garner public support, funding, volunteers or activism. No amount of marketing campaigns or awareness promotions will encourage frugal and pragmatic noncommercial organizations to register for a .org domain UNLESS they see some inherent value in owning the domain. Validation and the searchable DotOrg Directory provide this value for noncommercial organizations.

While traditional marketing or branding efforts may inform the noncommercial community about the registry, and information portals or philanthropic grants to noncommercial entities may well be worthy projects, they are duplicative of existing efforts. We believe that our approach - validation and the DotOrg Directory - meets the criteria of providing a new and needed resource to the noncommercial community, increases the usefulness and value of the .org domain, and creates a stable and growing registry.

**NCDNHC Page 10: Response to the NCDNHC’s criticism that the DotOrg Foundation encourages defensive registrations:**

The DotOrg Foundation does not intend to encourage defensive registrations. In fact, our goal is to encourage noncommercial registrations, as demonstrated by our concrete product and service plans. The confusion may arise from an overly broad reading of our

answer to question C38, where we briefly mention *potential future* products and services. We stress the words “potential” and “future” because as we specifically stated in our application, we would only introduce them “upon consultation with the .org stakeholders and our Advisory Board in order to be responsive to the needs of the community.” Considering that noncommercial registrants will have representation on the Advisory Board and the opportunity to have voting members on our board of directors, clearly the Foundation would not make business moves that would raise strong opposition from the noncommercial .org registrants. Therefore, the fact that we mentioned possible intellectual property searches among potential future products and services should be viewed as simply our canvassing of future possibilities – not an intent to do so today.

We are all aware of discussions within the ICANN community and among the U.S. policy and political establishment regarding increased Whois-based services designed to protect intellectual property. If such changes were to occur, the .org registry may well need to introduce compliant products and services. But, we do not want to predict that today. Rather we want to concentrate on governance mechanisms and concrete services that actually serve the .org noncommercial community.

**NCDNHC Page 10: “the vagueness of these proposals earned DotOrg a moderate score in the Registrar criterion.”**

Both our application and our response to supplemental NCDNHC questions detailed our marketing and outreach plans. If you would refer to our answers to questions C31, C35 and C38, excerpted below, you would note our plans ranging from training of registrars and providing them with a seat on the Advisory Board, from where they can elect a voting member of the board of directors; to coordinating with registrars on specific outreach initiatives such as newsletters, participation in on-line and in-person forums, and co-marketing activities. For further detail of the plans in our application, below is a synopsis of our earlier responses. However, our caveat to all of these ideas remains - we want to consult with registrars and other .org stakeholders, like the noncommercial community, before finalizing plans. Rather than being vague, we wanted to avoid such extreme detail that we would appear to be preempting discussions with registrants and registrars.

***From Response to NCDNHC Questions Posted on the ICANN Site:***

*Registrar Education*

*In order to make the .org TLD more widely available to non-commercial organizations, we will seek to inform registrars of any new benefits in the .org registry and any impending changes through:*

- *email updates,*
- *seminars at ICANN conferences,*
- *participation in other Registrar Constituency activities and programs,*
- *hosting of an interactive community outreach space on the Foundation’s website to provide regular updates and information regarding the .org TLD and enable .org stakeholders, users, and other Internet consumers to provide input to the registry and share ideas among themselves,*
- *live demonstrations of the registry’s Account Management Interface (AMI), which is an on-line interface through which registrars can manage registrations, run reports and monitor billing activities, and*
- *access to registry account managers who would provide individual assistance regarding launch and transition, the new registry-registrar protocol, new product introductions, and other ongoing support.*

*The DotOrg Foundation’s marketing strategy will be designed and implemented in consultation with registrars. We will encourage them to also attend and sponsor events*

at various conferences, and if possible, support their attendance with co-marketing funds, facilitation of travel arrangements, and help in preparing materials and presentations for the events.

In summary, the DotOrg Foundation will work closely with registrars to ensure that all services being fashioned meet their needs. Beyond general outreach to the registrar community (some of which is discussed below, in answers to other questions), it is important to note that registrars will be invited to elect a member of the Foundation's advisory council. Three members of the council, moreover, will sit as voting directors on the Foundation's board.

#### **From Proposal Question C38:**

##### Registrar Outreach

The DotOrg Foundation also proposes to undertake registrar outreach initiatives in an attempt to make the .org TLD more widely available to noncommercial organizations. The DotOrg Foundation would reach out to currently accredited ICANN registrars to ensure enhanced participation in the .org TLD. Outreach to current registrars would include email updates, seminars at ICANN conferences, and participation in other Registrar Constituency activities and programs, to inform such registrars of any new benefits in the .org registry and any impending changes. Programs designed for current registrars would include live demonstrations of the registry's Account Management Interface (AMI), which is an on-line interface through which registrars can manage new and existing registrations, as well as run reports and monitor billing activities. Such programs would also include access to account managers who would provide individual and timely assistance as registrars negotiate new registrar agreements with the DotOrg Foundation and implement and launch the new registry-registrar protocol. The account managers would also be the registrars' main point of contact for any questions, new product introductions, or support on an on-going basis once the registrars launch their systems and are actively registering .org domain names.

In addition to current registrars, the DotOrg Foundation would also like to reach out to associations and similar entities that specifically communicate with noncommercial organizations, both in the US and globally. Outreach to these organizations would focus on encouraging them to become ICANN accredited registrars or partner with registrars in order to better serve their noncommercial constituents by offering .org registrations. The DotOrg Foundation would post a list of all .org registrars, with contact information, on its website.

In addition to members of the DotOrg Foundation attending such events, the registry will encourage registrars to attend and sponsor events at various domestic and international conferences, and if possible, support their attendance. Support to build public awareness could include co-marketing funds, facilitating travel arrangements, and helping to prepare materials and presentations for the events.

##### Education and Public Awareness

The DotOrg awareness campaign would include the following outreach to noncommercial entities:

- Advertising in trade publications;
- Participation in tradeshows;
- Viral email campaigns;
- Direct mail campaigns;

- *Banners on partner registrars if applicable; and*
- *A public relations campaign, including a Video News Reel (VNR) featuring industry experts stressing to the public the importance of looking for a validation Seal prior to transacting with any nonprofit site, a schedule of press releases reiterating content featured in the VNR, and pitching the story to major news organizations.*

#### Registry / Registrar Co-Marketing

*Much of any marketing strategy targeting end-users would be the responsibility and decision of the .org registrars. The DotOrg Foundation's marketing strategy would encourage registrars to heavily promote the .org TLD, and provide them with a new message to offer to their existing customers and as a way to increase new registrations and renewals. The DotOrg Foundation, in consultation with registrars, proposes to develop materials for use in registrar marketing and would encourage aggressive media strategies at the registrar level. To further encourage registrar marketing activities, the DotOrg Foundation may offer co-marketing funds to registrars to be used to target noncommercial end users. Marketing initiatives that are likely to be eligible for co-marketing initiatives include media and creative costs for online, print and direct mail. Additionally, the DotOrg Foundation would consider co-sponsoring various registrar promotions such as product giveaways and renewal incentives.*

#### **From Proposal Question C31:**

*Registrars sponsoring .org will enjoy increased levels of service and new products geared at increasing the number of noncommercial registrants in .org, allowing registrars to improve their ability to attract more registrants. This will be particularly helpful for competitor and new registrars that have not benefit from legacy registrants that use the legacy registrar.*

#### **From Proposal Question C35:**

*The DotOrg Foundation will strive to:*

- *Create mechanisms and open governance structures to elicit dialogue with and participation by .org stakeholders, particularly the noncommercial Internet community;*
- *Listen to and understand the noncommercial community's goals and concerns and build an engaged and participatory constituency;*
- *Provide for transparent and accessible meetings and decision-making processes that allow for global participation; and*
- *Include accredited registrars in outreach and policy formation mechanisms.*

*An important component of being responsive to the noncommercial community is to listen to what this community is saying. The DotOrg Foundation will provide at least six public "town hall" meetings to solicit comments from the noncommercial community. The number of these meetings, four held in conjunction with ICANN meetings, and two additional meetings to be in other regions not on ICANN's schedule, should eventually increase as the community grows. The meetings will allow for both in-person and virtual participation through the Internet.*

*In addition, the DotOrg Foundation's website will have message boards and other interactive components to allow worldwide feedback. Foundation staff will actively monitor and participate in these discussion boards.*

*The DotOrg Foundation also will provide to registrars newsletters on at least a quarterly basis focused on issues and ideas for success of noncommercial organizations. These newsletters will be educational in focus and will available in several different languages. The registrars may wish to send the newsletters to.org registrants.*

*Through the newsletters and other means, the DotOrg Foundation may conduct surveys in cooperation with registrars to understand the needs of the .org constituency and their satisfaction with the DotOrg Foundation's stewardship of the .org registry.*

*The DotOrg Foundation will encourage and promote the use of its website and its interactive tools for the benefit of the community, but it will also participate in other forums and discussions in furtherance of its mission. In addition, the Foundation will look to the activities of other groups, such as associations, trade groups, governmental organizations, and research gatherings for opportunities for the Foundation to participate and listen to these audiences.*

*The DotOrg Foundation will encourage the formation of international associations focused on the needs of noncommercial organizations using the Internet. As these groups are created and nurtured over the next several years, the Foundation can use these groups as a major component of its outreach and listening. In fact, if possible, the Foundation would encourage and try to facilitate entities that serve the noncommercial community to become accredited or partner with accredited registrars in order to better address that community's needs.*

**NCDNHC Report Page 17: "DotOrg did not propose any methods to assist noncommercial registrants to participate in ICANN processes."**

We proposed being a conduit to ICANN and to the extent possible, potentially funding stakeholder participation (which may include travel) to .org meetings, which be timed to coincide with ICANN meetings.

We also provided an improvement in participation that should be of particular interest during this time of ICANN reform. Our registry would allow for direct voting representatives from the noncommercial registrants to our governing board. In this manner, noncommercial registrants would have not only a say in .org business and policy decisions, but be part of one of the key stakeholders within ICANN, and therefore direct one of the powerful advocates for the non-commercial community within ICANN. As evidence of our commitment to noncommercial participation in domain name decisions, please see our answer excerpted below about consulting with this community prior to introducing new services.

Finally, part of our strategy of encouraging participation in ICANN related activities stems from our openness regarding policy changes on the .org registry, hosting open and un-moderated discussion boards, educating the non-commercial community about what ICANN does and how it impacts the non-commercial sector through participation in conferences and seminars (C38), and by having our town-hall meetings concurrent with ICANN meetings worldwide (C35). The last component is critical to showing that ICANN has a human face to the community – most of whom will not travel to a meeting, but would attend if they knew that there was a meeting nearby where they could first learn about ICANN and then participate in discussions focused on how the registry and ICANN can help them in their everyday operations.

***From Proposal (Question C38):***

*New Services*

*The DotOrg Foundation plans to implement a series of new technologies and services over the next several years to increase the usefulness of the .org TLD and to increase*

*the adoption of .org by the noncommercial community. These proposed new products and services will be shared with the .org community for comment and suggestions prior to development. Development of new products and services must meet some or all of the following criteria:*

- *Support and foster the participation of the noncommercial sector on the Internet, particularly those in developing countries and under-served communities;*
- *Enhance the global dialogue among the noncommercial registrants;*
- *Support the use of multi-lingual interfaces as much as is technically and financially feasible;*
- *Support noncommercial registrants' understanding of and meaningful participation in the domain name system and ICANN*

## **Appendix A: Validation White Paper**

*The document below was posted on the ICANN site and sent to the NCDNHC as part of a response to their inquiry to all bidders.*

The .org Internet space, traditionally the home of nonprofits and others engaged in non-commercial speech, has improved the ability of people around the world to communicate, share ideas and form alliances. Civil rights groups, faith-based organizations, charitable foundations, and many other non-commercial organizations use a domain name ending with .org to establish their web presence and, in some cases, their only presence.

Whatever the impact of the Internet on non-commercial organizations, the potential of the .org space is clearly not being achieved. Whether it is to register their domain name or conduct transactions, organizations and individuals are failing to turn to the .org space as much as we believe they might. One fact, above all, demonstrates the challenge: The number of active .org domains is declining even as the number of non-commercial entities steadily grows.

To meet this challenge, the DotOrg Foundation proposes to develop new services that we believe will involve and excite the worldwide community of organizations and individuals who are engaged in non-commercial speech. These services rest on our understanding of two key problems that beset the .org space.

### Trust

Regardless of their differences, all non-commercial organizations have something in common: They survive on the trust accorded them by their supporters and the general public. With so many high-profile cases of fraud and accounting irregularities at leading non-commercial organizations, the public is understandably wary: Is that group real? Is that web site real? Will my donation be well spent?

The DotOrg Foundation believes that we can create trust within the .org space. By doing so, by offering services that will help non-profit organizations protect what is really the coin of *their* realm – trust – we will demonstrate to those organizations that they should, that they must, participate fully in the .org space.

### The .Org Difference

What does it mean to be a “.org”? It is not evident that there is an agreed answer.

It is this lack of clear differentiation that diminishes the potential for the .org domain and undermines its future. The answer to the .org domain's problems does not lie simply in the purchase of advertisement or the mounting of public relations campaigns. Rather, the way to differentiate the .org domain is to support organizations and individuals engaged in non-commercial speech with services that make it easier for them to pursue *their* goals.

The richness of the .org community, moreover, extends far beyond the boundaries of any one nation. The services to be provided through the .org TLD must reflect the needs and challenges to be found in Africa as well as America, in Central Asia as well as Western Europe. Indeed, even within the developed societies, there are under-served communities whose members have much to offer the global .org space. Our challenge is to help them to fully participate as well.

In sum, it *can* mean something to be a .org. We propose to create that meaning.



## Proposed Services

### The DotOrg Directory

The DotOrg Foundation believes that the initial step to address the issues of trust and differentiation is the creation of a database containing pertinent information about non-commercial organizations with .org domains. Inclusion in the database is optional and free to all .org domain holders, but the value of being in the database will be realized specifically by non-commercial organizations.

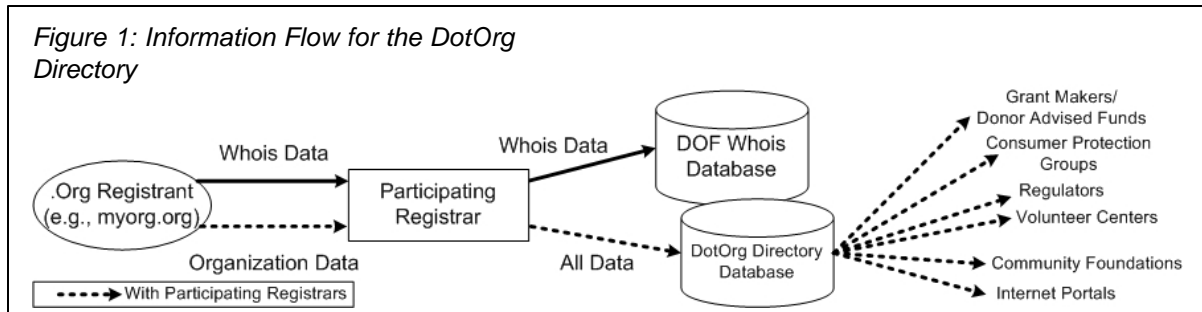
Information provided by each organization will be collected through a participating registrar and stored centrally by the DotOrg Foundation. The non-commercial organization will have the option to provide as much of the requested information about itself as it wishes (e.g., address, website, mission) during registration, or any time thereafter during the registration term.

By having reliable and readily available information about the group whose site they are reading, members of the public will have added confidence that they are interacting with an organization that they can call or even visit if they have questions. This database is the first step in building trust with the public through the .org domain.

In addition, after consultation with ICANN, registrars, and registrants, the Foundation may help to distribute this information to wider audiences through partnerships with data providers. One such partner may be GuideStar which licenses data about U.S. non-profits to donor-advised funds such as Fidelity (which has given over US\$2.8 billion in grants), giving portals such as Network for Good (which has processed over US\$22 million in donations since 1999 for over 8,000 non-profits), community foundations, and state regulators. Licensees use GuideStar and other similar databases to provide comprehensive information to their own members or the wider public as they research which organization to support.

By helping to disseminate basic information about non-commercial organizations, we will be providing a valuable service – to both the organizations and their supporters. By laying this foundation of organizational transparency, moreover, we will be promoting the creation of new Internet portals that can provide information about non-commercial organizations around the world. By this simple, yet key step – the creation of the optional DotOrg Directory – the DotOrg Foundation will be generating new value for .org registrants, creating market distinction for the .org domain, and increasing the likelihood that those engaged in non-commercial activities will register .org sites and participate in the .org space.

The flow of information from the non-commercial organization to the public is outlined in Figure 1 below.



## Validation

In developed and developing nations alike, there is wide understanding that non-commercial organizations are essential to the building of a vibrant civil society. Whether they are called non-commercial organizations, charities, non-profit organizations, or NGOs, they are growing rapidly in number and impact. The public – often called upon for financial and political support – increasingly seeks information about the validity of the groups approaching them. While the Internet is clearly a powerful means for organizations to talk about themselves, the public is looking for more. They want confirmation about the claims they are seeing.

The DotOrg Foundation seeks to support those who provide that confirmation. Validators, as we choose to name them, come in many forms. They are often non-commercial groups themselves, perhaps based at a university, perhaps part of a trade association. Some are independent watchdog groups; others are divisions of state or federal governments. Whatever their form, validators provide independent, trusted advice to the public.

As civil society more and more turns to non-commercial organizations, the reassurance offered by independent validators will become more and more valuable. And, as the need for such validation grows, we believe the .org TLD can become an important contributor.

Given the range of validation already in existence, we recognize the need to proceed carefully, in full dialogue with those already performing this important service. The DotOrg Foundation intends to work closely with such validators as the Better Business Bureau, the National Charities Information Bureau, federations of the Combined Federal Campaign, the Canadian Centre for Philanthropy and others in North America; with Charities Aid Foundation, Interaction, the Synergos Institute, the Union of International Associations, German Charities Institute and others worldwide. Only by knowing what these established validators need can we build truly effective services.

That said, based on the experience offered by members of our board of directors and discussions with leaders from established validators, we can outline here the services we expect to develop:

1. The DotOrg Foundation will identify qualified validators that non-commercial organizations can use to review and certify aspects of their operation. Such validators may be trade associations, federations, independent watchdog groups, and so forth.
2. The DotOrg Foundation will provide to all registrars the list of qualified validators, with a description of the service each validator is offering and a wholesale price being charged by that validator. We anticipate that the wholesale price will range widely, based upon the extent and type of validation and the conditions of the competitive marketplace.
3. Each registrar will be free to offer as a retail product the service of one or more of the approved validators. Registrars will be free to select validators whose services they wish to offer. They will be free to charge more than the wholesale price, thereby generating their own added revenue. Registrars will also be free to decline to participate in the validation program.
4. .Org registrants wishing to be validated through the DotOrg Foundation program will select one or more validators through the registrar. Depending upon the nature of the validation itself, registrants may be asked to provide information electronically through a dedicated section of the DotOrg Foundation web site or contact the validator directly.
5. Validators will inform the DotOrg Foundation electronically when a registrant has been validated. The Foundation will inform the validated group of its validation, offering a DotOrg Seal which the group may display on its web site. Individuals visiting the web site will be able to click on the seal to learn details of the validation.

We believe that the DotOrg Validation program will expand the number of validators worldwide while providing both current and new validators with the needed infrastructure to more efficiently do their jobs. We propose to build upon the relationships that registrars already have with

registrants, providing them a new and valuable product. Working with established validators, we propose to develop a program that is simple for registrars, registrants and web site visitors to use, a program that encourages transparency and accountability in the non-commercial space.

The process will be simple and integrated into the registration process already familiar to registrars and registrants. We will provide on-line forms to collect information through the current toolkit, methods to post the results of the validation into the DotOrg Database, billing and payment systems for validations, and secure certificates that can assure a person that she or he is on the right site for the non-commercial organization. We will also develop the necessary marketing so that all who potentially can benefit – registrants, validators, registrars and the public – will know of and understand the opportunity being offered.

Figure 2 shows the information flow of validation information.

