

Rome, 17 July 2013

Dear Mr Fadi Chehade,

Two of our representatives were very happy to meet you, if only briefly, at the EuroDIG meeting in Lisbon. There was one matter they had hoped to discuss with you but I guess everyone was too busy attending to the main business of the conference.

eNACSO has followed closely the current round of applications for new gTLDs. In particular we have taken an interest in the following proposed endings:

.kid, .kids, .game, .games, .juegos, .play, .school, toys.

Clearly domains such as these very specifically target children and young people or they are highly likely to attract large numbers of children and young people.

We can see great potential in developing some or all of the aforementioned domains. However, we have a few questions about the processes ICANN followed because, in our view, these raise important policy questions in terms of promoting and protecting children's rights.

In advance of putting out the call for new applications for gTLDs did ICANN decide that, in respect of any applications which might have a preponderant or exclusive bearing on children's or young people's interests or their welfare that additional or particular terms, conditions or qualifications ought to be applied? Or was it that case that no such additional items were set out and that applications of the kind mentioned fall to be considered in an identical way to all other applications in other categories where there is no obvious or particular child welfare interest?

Thus, whilst we note that on page 107, 18 (c) of the gTLD Applicant Guidebook you ask

*What operating rules will you adopt to eliminate or minimize social costs (e.g., time or financial resource costs, as well as various types of consumer vulnerabilities)? What other steps will you take to minimize negative consequences/ costs imposed upon consumers?*

and elsewhere, on page 115, there is a reference to

*Abuse Prevention and Mitigation: Applicants should describe the proposed policies and procedures to minimize abusive registrations and other activities that have a negative impact on Internet users.*

It is not clear how and by whom any answers received will be assessed in relation to the interests of children and young people. Could you tell us, therefore, if ICANN sought and obtained any advice or guidance from any persons or organizations with a background in online child protection and child safety issues? If so can these entities be named and is the advice which they gave you in the public domain or open to inspection by interested parties?

We also note that at page 102, vii, you ask applicants to declare if anyone associated with the application

*has ever been convicted of any violent or sexual offense victimizing children, the elderly, or individuals with disabilities?*

Clearly this is an important question but could we ask what means do you have at your disposal to check if the answers given are accurate?

Yours sincerely,

Cristiana De Paoli,  
eNACSO Executive Board

The European NGO Alliance for Child Safety Online is a network consisting of Children's rights NGOs from across Europe working for a safer online environment for children

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