



**.ORG DIVESTITURE:
EVALUATION OF
CRITERIA 4, 5 and 6**

FINAL REPORT

**ICANN/DNSO
NON COMMERCIAL CONSTITUENCY
EVALUATION TEAM**

INTRODUCTION

In July 2002 ICANN's management asked the DNSO's Noncommercial Domain Name Holders' Constituency (NCDNHC) to assist in evaluating the bids submitted to ICANN to take over the .org registry management. ICANN specifically asked for assistance with respect to Criteria 4 (differentiation), 5 (responsiveness to the noncommercial community) and 6 (public support among noncommercial users). The letter from Stuart Lynn making this request is provided in Annex 1 of this document. The NCDNHC organized a dedicated evaluation committee made of 8 members, chaired by Harold Feld. The members performed the work in full consultation through e-mails and phone conferences. The list of the evaluation committee members is provided in Annex 3.

The first draft of this report was released on August 24. Comments from the public and the applicants were filed and reviewed by the committee, and the report was modified as appropriate. A discussion of the applicants' comments and explanations for what was modified and what was not is contained in the **Supplemental Report** that was released with this report.

Due to his own discovery of a potential conflict of interest, Harold Feld resigned from the Committee September 3 and did not participate in the preparation of the Supplemental Report or the Final Report. Dr. Milton Mueller took over the role of chair.

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CRITERION 4: DIFFERENTIATION

The consensus policy regarding the .org domain was that applicants should find a way to strengthen the distinctive identity of the .org domain while at the same time keeping it open and unrestricted. The exact language defining this criterion in the RFP is produced here:

A key objective is differentiation of the .org TLD from TLDs intended for commercial purposes. Appropriate marketing practices are a primary tool for achieving that objective. Proposals should include detailed planned marketing practices designed to differentiate the .org TLD, promote and attract registrations from the global noncommercial community, and minimize defensive and duplicative registrations.

In evaluating the proposals along this dimension, we scored the following six factors:

- *Market research.* Did the applicant do real research on the uses and users of .org?
- *Positioning.* What kind of identity are they proposing for .org? Is it supported by the research, is it clear and capable of “promoting and attracting registrations from the global noncommercial community?” How well thought-out is the marketing plan?
- *Defensive registration.* Did the applicant propose concrete strategies or methods to discourage defensive and duplicative registrations?
- *Unrestricted.* Are the proposed differentiation methods consistent with the policy objective of keeping .org unrestricted and open?
- *Innovation.* This refers to *technical* innovations in registry software or systems proposed to differentiate the domain or its management. How desirable or undesirable are these services from a noncommercial user’s point of view?
- *Registrars.* Because registrars are the channel through which current and prospective .org registrants are served, did the proposal demonstrate that the applicant understands the challenges of leveraging this relationship, and propose feasible methods of working with registrars to differentiate the domain?

We evaluated each of these factors on a 6-point scale ranging from 0 to 5. We considered *Positioning*, *Lack of restriction*, *Innovation*, and *Relations to Registrars* to be the most important evaluation criteria in the differentiation realm; these criteria were weighted at one (1). “Defensive Registration” and “Market Research” were weighted at one half. The performance of each applicant on each of these factors and their overall rankings are displayed below:

Table 1
Ranking of Applicants by Differentiation Criteria

Applicant & Rank	Market Research	Positioning	Defensive	Unrestricted	Innovation	Registrars	Score
1. UNITY	3	4	4	5	3	5	20.5
2. RegisterOrg	4	5	0	5	0	4	16.0
2. GNR	5	4	5	5	0	2	16.0
4. IMS/ISC	0	5	0	5	5	0	15.0
5. Neustar	5	3	4	5	0	2	14.5
5. Internet Society	3	3	2	5	0	4	14.5
7. DotOrg Foundation	2	2	0	2	3	4	12.0
8. Organic Names	0	2	3	5	0	3	11.5
9. SWITCH	0	0	0	5	5	0	10.0
10. UIA/Diversitas	2	2	1	2	2	1	8.5
11. .Org Foundation	0	0	0	5	0	0	5.0
Weighting	0.5	1	0.5	1	1	1	

SCALE	Very good	5
	Good	4
	Acceptable	3
	Mediocre	2
	Poor	1
	None	0

In this case, the top applicant stood significantly above the rest, as the only one to address each of the criteria satisfactorily or better. Thus, it occupies the first tier (orange color) by itself. The differences between the next five applicants in the second tier (magenta color) are less pronounced (the second and fifth rankings were ties). Applicants in the bottom tier (light-green color) either ran afoul of the policy requirements or failed to research and elaborate their plans sufficiently to make the proposal credible.

RANK 1: UNITY REGISTRY

The strength of this applicant is that it gave careful thought to all the ramifications of the problems of marketing and differentiating an unrestricted domain, and came up with a comprehensive and integrated plan to address the challenge. Many of the same good ideas appear in various other proposals; this proposal, however, was the only one to put them all together in a coherent and complete way.

The proposal divides the market for .org names into three segments, with each needing a distinct message:

- For noncommercial registrants: “.org is the online space that defines you.”
- For commercial registrants: .org is “the space to make your case; i.e, defensive registrants will be encouraged to use.org names in a new and positive way, to highlight their social responsibility activities, rather than simply redirecting them to their .com site. .Org promotion will be linked to Corporate Social Responsibility and Cause Related Marketing campaigns.
- For the general public, .org will be positioned as “the space to make a difference,” a place where people can find out about charities and support groups and the wide range of noncommercial online organizations. (One weakness in the Unity proposal is that it fails to recognize that individuals and families often register .org names for personal statements and websites.)

The Unity Registry proposal places great emphasis on securing the cooperation of registrars in repositioning the domain. It proposes a cooperative marketing program with real financial incentives for registrars; a cooperative advertising program; a registrar relations department; a road show for education of registrars. The largest allocation in the proposed market budget (40%) is for this.

Thirty percent of the marketing budget will be used to engage an international PR agency to develop a strategy to communicate the message about the “new” .org. carrying the key message of “this is your space, get your .org.” This plan is linked to Unity’s plan for a “thick registry: if you are listed in the directory then your profile and reach will benefit.

The proposal allocates 20% of its relevant budget to encourage corporate entities to use .org registrations to corporate social responsibility outreach. Unity proposes to work directly with PR firms to get them to encourage their clients to use .org in the recommended way.

Unity Registry plans to use a thick registry (one that contains a lot of voluntarily secured information about the registrant) to differentiate the domain. A “thick registry” will facilitate the building of directory services, new portals, and software tools to help citizens engage with the non-profit communities. Unity proposes to establish three channels through which the database can be used:

- A searchable, .org-branded directory
- Basic subsets of the directory on third-party websites
- Customizable subsets of the directory on third-party websites.

RANK 2: REGISTERORG AND GNR (TIE)

REGISTERORG

This applicant also displayed very good market research, and showed a good understanding of the types of registrants in .org and their diversity. Based on the DNSO policy statement, it articulated one of the most appealing identities for the domain: “A

place for people, causes, and ideas.” It is committed to keeping .org open and unrestricted. While RegisterOrg did not propose any innovative technical services, it showed a thorough understanding of the marketing problem and how to leverage the relationship with registrars. It proposed to expand the registrar channel to include portal sites, hosting companies, and offline businesses that have not traditionally participated in domain name distribution. It proposed to develop an extensive toolkit for registrars. It outlined a media placement strategy, with detailed budget allocations that were probably too specific to be realistic.

On the downside, the proposal did not specifically discuss minimization of defensive registrations. While the \$2.5 million Community Organization Grants administered through the Benton Foundation and the Open Society Institute are ranked highly in the “good works” element under Criterion 5, there is no explanation of how those expenditures will strengthen the identity of .org or develop the market for .org registration and we remain skeptical that the proposed expenditures will have that effect.

GNR

This applicant developed a clear and valid definition of “noncommerciality” and engaged in detailed analysis of the great variation in the types of registrants and uses in .org. It has developed a clear brand identity (“The Community Capital” with visual symbol), written a vision statement that explicitly recognizes the diversity of .org, and proposes an OrgCentre (“Open resources for the community”) to reinforce this identity. Its marketing materials will emphasize its 15% donation to “worthy projects.” It does discuss its relationship with registrars, but its ideas were not as detailed as the top-ranked applicants.

As in the first-ranked applicant there is a strong emphasis on repurposing .org among corporate registrants. The strength of this proposal is that it draws on the International Federation of Red Cross and Red Crescent Societies for that purpose, piggybacking upon those organizations’ existing corporate partnerships. This aids with defensive registrations; however, we felt that this aspect of differentiation was overemphasized in the GNR bid. Corporate repurposing among major partners of IFRC may help with some defensive registrations, but not enough concrete steps were proposed to market to new noncommercial users.

RANK 4: IMS/ISC

This applicant’s approach to differentiation was unique and, to some members of the committee, highly appealing, but also raised some concerns. IMS/ISC has already articulated a strong identity for the domain by positioning it as a “public trust” and emphasizing its own roots in the technical community and its legal status as a nonprofit public benefit corporation. The strong response of a certain portion of the .org registrant community to that identity is documented in the section on Public Support. The applicants promise to publish the source code of all their software, to develop new technical tools, and to develop generic second-level domains in .org (such as resource.org, phone.org, fax.org, etc) into “public utilities,” leading to the highest score in “Innovation.” This is the only applicant who expressed interest in “reducing the number of domain names sold” under .org.

We feel extremely confident that a .org domain run by this applicant would become, and be perceived as, genuinely “different.” But we have concerns. While the proposal is rich in ideas for innovative services it is weak in articulating strategies to market the services. It is weaker still in making efforts to discover whether end users actually want the proposed services. The proposal contains no research on the market, typology or demographics of .org registrations or the uses and users of the .org domain. The proposers claim to have “strong roots in the noncommercial world” but those roots are in the world of Internet technical developers – a tiny slice of the two million .org registrants. There is no discussion of how to minimize defensive registrations. The proposal conspicuously lacks any discussion of the role of registrars in promoting – or undermining – their desired image and methods of differentiation.

RANK 5: NEUSTAR

The Neustar proposal contains excellent market research. It also begins with a strong pledge not to promote defensive registrations and to market exclusively to noncommercial. This simple pledge may not be formally enforceable, but it is such a clear and unambiguous statement that any major deviation from it would make the breach of the promise obvious to anyone who cared to notice. The proposal does not articulate a clear brand identity, but the marketing plan is thorough and clearly based on what they discovered from the market research. There are no particularly innovative technical or service proposals in this application, except for a verification service designed to encourage trademark holders to relinquish .org names when an alternative registrant is genuinely noncommercial, and an “Enhanced Whois” service to facilitate IP searches of the registrant database. The former service is laudable but the latter undermines differentiation and encourages defensive and duplicative registrations. Also, compared to the Unity and RegisterOrg proposals, relatively little was done to manage the relationship with registrars in special ways to promote a distinct noncommercial orientation.

RANK 5: THE INTERNET SOCIETY

The Internet Society performed original market research and pulled together a lot of statistical material about .org from public sources. Its proposal emphasizes that .org lacks a brand image and that ISOC will provide it with one. Despite the wealth of statistical detail in the proposal’s discussion of marketing and differentiation, one does not come away from it with a clear brand image or creative strategy for reinvigorating the .org domain. ISOC’s proposal to brand .org as the “Internet home of non-commercial entities” struck this group as somewhat flat and uninspiring. Moreover, ISOC’s own research shows that .org is already generally perceived in this way, so it is unclear how this positioning would improve things.

The ISOC proposal relies entirely on marketing and registrar relations for differentiation; it offers no innovative “thick registry” services. ISOC would minimize defensive and duplicative registrations by focusing outreach on a limited target: non-commercial entities not yet on the Internet, especially outside the USA. It would avoid “large media purchases” and concentrate on personally educating leaders and executives of nonprofit organizations.

Regarding registrar relationships, ISOC proposes to help registrars by providing them with “a wide array of marketing materials.” Most significantly, it will offer financial incentives to registrars for delivering “quality registrations” of .org names; i.e., registrations that are actually used rather than parked. The feasibility and sustainability of this plan requires closer scrutiny than we can give it here, but it seems like a good idea.

In sum, ISOC focuses on broadening the geographic scope of .org registrations but, unlike some of the other proposals, does not seem to do much to strengthen the value proposition.

RANK 7: DOTORG FOUNDATION

The DotOrg Foundation proposal did not cite any market research; however, unlike other proposals that promise they will do such research in the future, this proposal does a thoughtful job of identifying items that need to be researched.

DotOrg proposes a validation product to differentiate .org. Validation is optional but the applicant claims that it “will engender a far greater level of public confidence when encountering validated noncommercial organizations online” and “will facilitate the validated organizations reaching their audience and conducting transactions with them.” Validation is decentralized; according to the proposal, “each validator would be responsible for establishing a wholesale price for its services. Registrars would decide which, if any, validators’ services to offer through their websites and set the retail prices to be charged to their customers.”

The evaluation team’s response to the validation concept ranged from lukewarm to strongly negative. At best, it was perceived as a harmless attempt to differentiate the domain voluntarily, by means of optional certifications. Those taking this view thought it inappropriate to speculate on whether or not such a service would actually be feasible in the marketplace. At worst, it was perceived as a backdoor attempt to transform .org into a sponsored, restricted model. Somewhere in the middle were those who believe that bundling domain name registrations with optional validations makes no sense as a criterion for awarding the domain. These concerns need to be outlined in more detail.

Currently, the trust we put in noncommercial organizations is not based on their domain name. It is based on public reputation and in some cases on a special legal status, such as 501-3(c) in the USA, or other forms of validation. There are numerous legal mechanisms and accreditation agencies to solve the problem of trust. It is not clear what is gained by coupling these functions to the operation of a domain name registry *unless one is actually going to restrict entry into the domain on that basis*, as is done with .edu, .museum, .coop or .mil.¹ Thus, if a validation service is viable as a purely commercial, voluntary

¹ One point of consensus from the .org policy process was that if ICANN wants a fully “validated” domain for nonprofits, it should simply create a new TLD for that purpose. .Org is not suitable for that purpose because of its legacy of openness and its heterogeneity.

proposition, DotOrg Foundation and associated registrars could do it *without having any control over the .org registry*.

Two things are clear: 1) validation will be an added cost, for those who choose to do it, and 2) any validation and seal program requires achievement of a significant critical mass of buyers and widespread understanding among the user public before it can improve trust and therefore create an incentive among domain name registrants to pay the extra amount. If validation is used by only a small number of web sites – and/or if the sources and criteria for validation are so heterogeneous that the public does not understand them – the seal will be a meaningless detail and Internet users will not care whether a site is validated or not. If that happens, no one will pay extra for the service, and hence validation will do nothing to differentiate the domain. These concerns led to a Low score on Unrestricted, but the validation proposal was recognized as a technical innovation, leading to a Moderate score in that element.

A more serious problem with the DotOrg proposal is that it develops special techniques to encourage Intellectual Property searches of the .org database. That aspect of the proposal actually works *against* differentiation of the .org domain, by encouraging .com holders to continue imposing the same standards and criteria to .org names that they apply to .com names. Such methods would seem to invite defensive registrations rather than discourage them, in direct conflict with the recommended consensus policy. That is why this proposal earned a “Zero” in the “Defensive registration” element.

Regarding registrar relations, DotOrg says that it 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 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.

RANK 8: ORGANIC NAMES

There is no substantive market research underlying the Organic Names approach to differentiation. Even some of the numbers are obsolete (the proposal claims that there are over 3 million registrations in .org). The proposal says that market research would be conducted later.

The proposal does put forward an identity: “organizations with a human face.” The proposal puts almost all of its branding emphasis on corporate repurposing. Organic Names “seeks to bring a branding of corporate social responsibility to .org”. It “wishes to encourage the adoption of the .org name by organisations and corporations that see themselves as having a social dimension.” While this is a good way to approach defensive registrations we don’t think it is viable as an identity or strategy for the entire range of noncommercial entities, many of which are not corporate.

Organic Names proposes to promote the domain through co-marketing with registrars, by offering them rebates or discounts. But as far as we can tell their approach does nothing to encourage registrars to market the domain in a particular way.

RANK 9: SWITCH

SWITCH performed no market research. It did not propose a specific identity or brand for the domain. There was no discussion of how they would minimize defensive registrations. There was no discussion of how the registrar relationship would be leveraged.

On the positive side, SWITCH is committed to keeping registration in .org open and unrestricted. SWITCH did propose innovative services that in our opinion would be useful to .org registrants and would help to differentiate the domain. Specifically, the applicant proposed cooperative advertising arrangements (funds given to .org name holders to support “campaigns of non-commercial ORG registrants, and prominently featuring their ORG domain name”); a directory service; and a community gateway website. Funds for cooperative advertising would be allocated by a committee in which .org registrants would have some input. The registry would collect data about the nature and scope of activities of non-commercial ORG registrants for publication in the SWITCH2ORG search engine. The directory service would allow keyword searching by “themes.” ORG-at-a-Glance will act as an ‘automated broker’ between those wishing to publish information on a given topic and those wishing to subscribe to such information. These are all interesting and valuable proposals, developed credibly by the proposal.

RANK 10: UIA/DIVERSITAS

UIA would position the domain as “the natural home for civil society” and “The gTLD home of the non-profit community.” Both may seem obscure or unexciting to registrants and, as has often been noted, many noncommercial org registrants are not formally incorporated as nonprofits. The UIA proposal contains no market research, but a promise to conduct market research in the future. It also contains a promise to “work with a creative or branding agency to create a distinctively new identity for .org that places substantial distance from its U.S. centric past,” indicating that it has not yet conceived of a distinctively new identity.

We appreciated UIA’s strong statement that the .org community is “heterogeneous” and should not have a homogeneous marketing policy. However, unlike the Unity proposal the UIA proposal contains no coherent ideas about how to reconcile the need for efficient marketing with the heterogeneity of the target community.

UIA attempts to supplement its differentiation claims by utilizing “authentication” technology to “stratify” noncommercial from commercial registrants. It (rather cursorily) discusses an opt-in “seal” program that would authenticate registrants as a genuine noncommercial entity. Our concerns about authentication strategies are expressed more fully in the discussion of the DotOrgFoundation proposal above.

² One point of consensus from the .org policy process was that if ICANN wants a fully “validated” domain for nonprofits, it should simply create a new TLD for that purpose. .Org is not suitable for that purpose because of its legacy of openness and its heterogeneity.

UIA claims that it will give “incentives” to registrars to inform current .org registrants of the changes it is implementing. But the incentives are unspecified. It says it is “developing co-marketing materials for registrars to use when talking with corporate registrants that have a number of defensive .org registrations. The nature of these materials is unspecified.

RANK 11: .ORG FOUNDATION

This application contains only the most cursory treatment of the marketing and differentiation issue. No market research has been conducted and no specific strategy or plan for doing this has been articulated. The applicant promises that it “will develop” an identity and “will identify” media venues for reaching the .org community with suitable messages. Presumably this is intended to describe its behavior after it has been awarded the domain. No specific methods or strategies for minimizing defensive and duplicative registrations was articulated; in fact, this proposal encourages defensive registration by proposing a “mini sunrise” period for expired domain names that privileges trademark owners. No innovative services were proposed. No relationship with registrars was defined.

CRITERION 5: RESPONSIVENESS TO THE NON-COMMERCIAL USER COMMUNITY

Criterion Five asks each applicant to detail “*mechanisms for promoting the registry’s operation in a manner that is responsive to the needs, concerns and views of the noncommercial Internet user community.*” The RFP also states that:

“The successor operator’s policies and practices should strive to be responsive to and supportive of the noncommercial Internet user community...”

As the text further explains, this criterion can be satisfied in a myriad of ways – from giving .org registrants a direct say in the management of the .org registry to teaming with non-commercial entities with broad roots in the non-commercial community.

As an initial matter, the Committee observes that any bidder can make promises. Accordingly, the highest ratings were given to detailed plans that were the most self-executing, thus avoiding the need for any continuous monitoring and enforcement by ICANN. The Committee also considered critical the level of details provided by the bidders, as this will serve as benchmarks for ICANN to measure the performance of the successful bidder and will serve as a definite guideline for enforcement. Vague promises of establishing some sort of council or researching the needs of the community after receiving the award were given little weight, while detailed plans with clear avenues for responsiveness were ranked more highly. Thus, a vague promise to allow the community to elect the entire board might rank lower than a detailed plan to create a truly representative advisory council.

“Responsiveness” does not mean merely on matters of policy, but includes general responsiveness to the needs of the community on an ongoing basis. The Committee notes, however, that the criterion asks for responsiveness to the noncommercial community specifically. Accordingly, general commitments to maintain a reliable registry, promises of lower prices for registration and pledges to provide general customer support, while important to noncommercial registrants, are important to all customers and do not address responsiveness to the noncommercial community specifically. By contrast, mechanisms designed to differentiate .org or to seek input from or representation of the noncommercial community specifically -- even on non-policy matters -- were considered within the proper scope of the evaluation for this criterion.

The most important evaluation criterion was the ongoing governance structure defined by the applicant.; i.e., what formal organizational mechanisms or structures are proposed to allow noncommercial .org registrants to influence policy and/or management? This was weighted double the amount of other criteria in our rankings.

In accordance with instructions received from ICANN management, the Evaluation Committee did not automatically assign any preference to a non-profit entity over a for-profit entity. Because past performance may prove to be an important indicator of future performance and commitment, the Committee did take notice of longstanding relationships between the bidders (whether for-profit or non-profit) and the non-

commercial community available in the public record. The quality of the relationship was also considered. As an example, any retail goods store has a “relationship” with noncommercial customers, but this is not a particularly noteworthy relationship that would indicate whether the retailer is “responsive” to the specific needs of noncommercial customers. By contrast, a for-profit retailer specializing in servicing noncommercial organizations could be judged by the character of this long-standing business relationship.

In this regard, the Committee also noted to what extent the bidder sought to work with the existing ICANN community, such as by responding on the public message board to questions formulated by noncommercial domain name registrants.³ The Committee also took account of the relationship the bidder proposes with the Noncommercial Domain Name Holders’ Constituency (NCDNHC) after winning the bid and whether the bidder will attempt to facilitate participation by the noncommercial entities in ICANN generally. The team recognizes that the NCDNHC is not synonymous with the entire noncommercial user community, but it is the only recognized constituency within ICANN for formal participation by noncommercial entities in ICANN processes. Applicants who wish to facilitate participation of the noncommercial community within ICANN on an ongoing basis should either express an interest in facilitating participation in the NCDNHC and facilitating the NCDNHC’s ability to work within ICANN, or provide alternative methods that are equally likely to bolster noncommercial .org registrants’ ability to participate in and influence ICANN’s affairs.

The Committee also considered, in accordance with the language of the criterion, any partnerships with non-profits formed for purposes of the bid. In considering these partnerships, the Committee looked to the nature of the partnership (e.g., how involved will the non-commercial partner be in the management of the registry or in formulating registry policy) and the demonstrated ability of the partner to engage the global noncommercial .org community.

Finally, the Committee also considered the commitments of bidders to serve the public interest. The Committee is mindful that in Accra, several Board members expressed skepticism on the relationship between “good works” and the running of the registry. Some Board Members observed that “good works” projects might be considered a tax on registrants to fund projects totally unrelated to the work of a registry or the goals of ICANN in supporting Internet stability. The Committee observes, however, that “good works” genuinely related to the mission of the .org registry act to differentiate the registry, may increase the ability of the noncommercial community globally to participate in management of the registry, and may enhance representation and stability. In line with

³ Nine of the eleven bidders chose to avail themselves of the opportunity to address the NCDNHC at Bucharest. Because that opportunity was not widely advertised, and because it was only announced one week before the Bucharest meeting, the Committee has not considered the failure to take advantage of this opportunity an indicator of non-responsiveness. In addition, the Committee observes that only two of the 8 evaluation team members were present at Bucharest, and that the Committee has relied exclusively on the content in the public record.

the Board's preferences, we weighted "good works" only half of the weight of other criteria in our rankings.

Table 2:

Responsiveness and Governance Rankings

Applicant And Rank	Input/ Governance	Pre-bid survey	Post-bid Responsiveness	ICANN/ NCDNHC	Relationship w. Community	Services targeted at community	"Good works"	Score
1. Unity	6	3	5	1	6	5	0	27.25
2. GNR	4	3	5	5	4	4	5	26.75
3. ISOC	2	3	5	5	3	5	2	21.25
4. DotOrg	6	0	5	0	3	3	0	20.50
5. UIA	2	1	5	5	3	2	0	16.75
6. RegisterOrg	2	5	5	0	3	2	4	14.75
7. IMS/ISC	2	0	6	0	3	3	2	14.00
8. Neustar	3	5	5	0	0	3	0	12.75
9. .Org Foundation	5	0	5	0	0	0	0	12.50
10. SWITCH	2	0	2	0	3	0	0	8.00
11. Organic Names	0	0	0	0	0	0	0	0.00
Weight	2.00	0.25	0.50	1.00	1.00	1.00	0.50	

Scale:

Very High	6
High	5
Moderately High	4
Moderate	3
Low	2
Very Low	1
None	0

RANK 1: UNITY REGISTRY

Unity presented a well-developed and workable model for providing community input on an ongoing basis. Unity promises to develop a cooperative of all .org registrants, which would create a policy council. The track record of Unity's parent Poptel creates confidence that it can and will carry through on this commitment. Although the Policy structure does not have formal ability to make decisions, a number of additional safeguards ensure that the registry will remain responsive to the community and that the proposed OPG will not be merely window dressing. (1) The use of a pre-existing independently developed standard (the "AA1000 Social Responsibility" scale developed by the institute of social and Ethical Accountability) and an outside auditor (Accountable) to provide objective measures of responsiveness; (2) The creation of the Operations

Advisory Group (OAG) to ensure that policy recommendations will be implemented; and, (3) The OPG will have oversight over a services and development fund.

Unity receives a “High” rating in community relationship because of the long-standing and broad relationships its parent Poptel has with the global noncommercial community. This relationship focuses in the area of telecommunications networks and services, the area relevant to consideration here. We have classed Unity’s commitment to take 10% of pre-tax revenue to develop services as a commitment to develop registry services responsive to the community rather than to create generic “good works.” Although this commitment does not propose a specific service, as some other bidders have, it represents a significant, concrete commitment of resources and creation of a defined mechanism for developing new, responsive services on an ongoing basis.

Since submitting the bid, Unity has been active in the public message forum and responded to the Questions posted there by the NCDNHC. It has therefore received a “high” in post-bid responsiveness.

RANK 2: GLOBAL NAMES REGISTRY (GNR)

Although a for-profit entity, GNR has partnered with the International Federation of the Red Cross and Red Crescent Societies (“Red Cross”). While the Red Cross is a global noncommercial entity with extensive relationships in the noncommercial world around the globe, in contrast to Poptel it has no extensive experience in the area of information technology and communications networks. While the Committee recognizes that GNR provides such expertise through its relationships with global registrars, it is still speculative as to how Red Cross and GNR will work through their partnership to blend their experiences on a day-to-day basis. As a result, the Committee ranked their community relationship as “Moderately High” rather than “High.”

The Committee recognizes that GNR has proposed both an aggressive outreach program through its .OrgCenter, significant input into the “Good Works” grants via the Causeway Community Foundation, a Steering Committee composed of members of the community, and to work extensively with the NCDNHC. We were also impressed with its transparency mechanisms. Nevertheless, we rated the Input/Governance as “Moderately High” rather than High for the following reasons. GNR’s proposed Steering Committee cannot provide the same level of input as a truly independent body because GNR will control appointment to the Steering Committee. Furthermore, because GNR will make the ultimate decisions on policy, it will have the power to define and distil consensus without any formal documentation tying the various inputs (Steering Committee, outreach, Red Cross) together. Indeed, although it commits to remaining responsive, GNR ultimately have the power to entirely ignore any input.

GNR has committed to working with the NCDNHC and to potentially giving travel grants to noncommercial entities so that they can attend ICANN meetings. For these reasons, GNR receives a “High” rating on ICANN/NCDNHC. GNR has participated in the public forum and responded to the questions posted by the NCDNHC. Accordingly, it received a “High” rating in that category.

RANK 3: INTERNET SOCIETY (ISOC)

The Internet Society is an international noncommercial organization with extensive relationships with other noncommercial entities, commercial entities, and governments. Some on the Committee expressed concern, however, that ISOC's associations extend only to the networking/connectivity community and not to a broader base of noncommercial entities. Furthermore, there was dissatisfaction with ISOC's tendency to regard itself as the voice of the Internet community. This concern was supported in ISOC's answer to Question C36, inquiring for evidence of global support, wherein ISOC relied primarily on its own Board of Directors and international network of chapters as evidence of global community support. While we agree that the existence of a membership and chapters constitutes evidence of support, it is surely true that the global noncommercial community and .org registrants are much broader than one organization with a few thousand members. Accordingly, the Committee ranked ISOC as "Moderate" on the "Relationship to Community" category.

Under ISOC's proposed governance structure, PIR (a subsidiary of ISOC) retains final decision making authority for the registry, and has no avenues for input outside its own organization. Also, the relationship between ISOC chapters, membership and its governance board are in flux at the moment, so it is not clear how much influence that would give .org registrants. Thus, the Committee rated ISOC "Low" in Input/Governance.

ISOC has participated on the public forum and answered the questions of the NCDNHC. It has also, in its application, expressed a commitment to working with the NCDNHC constituency and ICANN and to help support the NCDNHC financially. Accordingly, the Committee awarded a rating of "High" in both categories.

ISOC proposes a number of very innovative services designed to respond to the needs of noncommercial entities, not just registrants generally. ISOC therefore received a "High" rating in this category. Finally, the Committee notes that although it has made no commitment to support "good works," profits from the registry will go to ISOC. On the proposition that support for IAB/IETF standards processes constitutes "good works" we awarded ISOC a "Low" ranking in this category rather than a "None."

RANK 4: DOTORG FOUNDATION

The DotOrg Foundation describes an aggressive outreach program including a series of "town meetings" (four in conjunction with ICANN meetings). Its governance will include an Advisory Council (AC) initially chosen by the bidder but ultimately elected by .org registrants. The AC will elect three Board members. The Committee recognizes that the bidder may influence the outcome of the AC through its initial choices and that three directors do not equate with control of the board, which could ignore the AC directors. Nevertheless, because of the strong voice given to the community in the governance of .org and because of the aggressive outreach plan, the Committee gives DotOrg Foundation a "Very High" rating in Input/Governance.

The bidder has offered a validation service. The Committee has expressed concerns regarding this service as a means of differentiating the TLD in the discussion of the Differentiation criteria. Nevertheless, some members of the noncommercial community have expressed support for a validation service as responsive to their needs. Accordingly, the Committee has awarded DotOrg Foundation a “Moderate” rather than “None” rating in the Services category.

DotOrg foundation has participated in the public forum and answered the questions of the NCDNHC, accordingly, it has received a “high” in that category. DotOrg did not propose any methods to assist noncommercial registrants to participate in ICANN processes.

RANK 5: UNION OF INTERNATIONAL ASSOCIATIONS (UIA)

UIA is a non-profit with an extensive history of working with noncommercial organizations as a registry. While this function has brought UIA into contact with many non-profits, it does not indicate that it has extensive working relationships with these non-profits. UIA has acknowledged this to some degree in its letter to ICANN and in the discussion on how to interpret the initial claims in its application. Because the working relationship of UIA with the international noncommercial community is of a fundamentally different nature than what is at issue here, the Committee has given UIA only a “moderate” rating in its relationship to the noncommercial community. UIA has offered to work with the NCDNHC and funds to facilitate the participation of noncommercial organizations within ICANN. For these reasons, it received a “high” rating in the relevant category.

The rest of its application, however, suffers from too many generalities. While rhetorically committing to an open governance process that will facilitate consensus within the community, it provides no details, timetables, or clear limitations on its ability as the registry to act absent any community input or consensus. It promises to develop new services for the community but, unlike Unity, it provides no mechanism or commitment of resources.

Accordingly, the Committee has given UIA a “Low” ranking in the category of Input/governance and a “Low” in services. UIA has participated in the public forum and answered the NCDNHC questions, earning a “High” ranking in that category.

RANK 6: REGISTERORG

RegisterORG has partnered with the Benton Foundation and the Open Society Institute – two non-profits well known for extensive international work. It has committed substantial resources, \$2.5 million dollars, so that these organizations may develop input from the noncommercial community and facilitate noncommercial community involvement with .org. Ultimately, however, RegisterORG retains total control and may ignore any input generated through its noncommercial partners. Neither RegisterORG nor its noncommercial partners has detailed any plan for outreach. Therefore it received a Low rating in the Input/governance cell. RegisterORG has no relationship with the noncommercial community, except via its partnership with Benton and OSI. The extensive relationships of OSI and Benton and the commitment of resources cannot

entirely compensate for the lack of detail in the plan, particularly where Benton and OSI appear to be more in a consulting relationship than a true partnership. The Committee therefore gave this bid a “Moderate” rating in its relationship to the community.

RegisterORG has participated on the public forum and responded to the questions of the NCDNHC, receiving a High rating in that area.

The bidder has proposed extensive good works subsidies, which will be administered through two respected foundations active in communications and Internet policy.

Accordingly it was scored “Moderately High” in that element. The bidder proposes no relationship with the NCDNHC, and has not offered to facilitate participation of noncommercial entities in ICANN.

RANK 7: IMS/ISC

This bid has been extremely difficult to quantify. The principals have devoted their professional lives to the Internet community, and the Committee has the highest respect for their achievements. In addition, the commitment to put the code for the registry and registry tools in the public domain demonstrates a sincere commitment to manage the registry as a public resource. The proposed transparency mechanisms are also impressive. Furthermore, the Committee observes that the bidder has been an active participant on the public forum and responded within hours to the questions posted to them.

Ultimately, however, the bidders propose no formal governance or input mechanism beyond their personal reputations and their personal commitment to openness. The bid is highly personalized in the entrepreneurial character of the bidders. The Committee feels, however, that this provides an insufficient basis for responsiveness over the long term. Management of the bidder may change, or the current management may grow out of touch with the community. If that were to happen, the community would have no recourse.

Furthermore, the bidder appears entirely focused on responsiveness to the traditional technical community rather than to the broader noncommercial community. This is supported by the bidder’s “good works” commitment – a donation of 8% of its revenues to support the IETF and IAB. While such good works further the growth and development of the Internet to the benefit of all – including the noncommercial community – it is not specifically responsive to the needs of the broader noncommercial community.

Therefore, although mindful of the character and contributions of IMS and ISC and its principals, and impressed with the overall approach of the bidder to manage .org as a public trust, the Committee has given this bid “Low” ratings in Input/Governance, a “Low” rating in the Good Works category, and “Moderate” ratings in “Relationship to the Community” and “Services Targeted at the Community.”

RANK 8: NEUSTAR

Neustar has put forward a well-thought out governance plan that meaningfully involves the noncommercial community. Although the decisions of its proposed “Global Policy

Council” are not binding, Neustar’s guarantee of presenting the GPC’s recommendations to ICANN when ICANN must approve a new registry service provides some check on Neustar’s ability to ignore a GPC recommendation. Nevertheless, the Committee does note the limitations of the GPC. In addition, Neustar’s outreach and input channels, while transparent, are passive rather than active. The Committee therefore awarded Neustar a “Moderate” in this category.

Neustar has no general relationship with the noncommercial community and has not partnered with any noncommercial entity that could provide such a relationship. It makes no commitment to perform “good works” and makes no mention of facilitating noncommercial participation in ICANN or work with the NCDNHC. Neustar has participated in the public forum and answered the questions submitted by the NCDNHC.

Neustar offers one new service responsive to the noncommercial community. It offers to facilitate transfer of names from commercial entities to noncommercial entities by verifying for the commercial registrant that the noncommercial would-be registrant is not a cybersquatter. This would facilitate the use of .org names by genuine noncommercial entities that might otherwise be occupied by defensive commercial registrations.

RANK 9: .ORG FOUNDATION

The .Org Foundation exists solely for purposes of this bid. The sole Board member is a Seattle entrepreneur. It has no prior relationship with the noncommercial community. The bidder proposes using the recommendations of the At Large Study Committee as the basis of creating a .org at large. It also claims that a majority of the Board members will be elected by the .org registrants. Implementation of these recommendations seems unclear to the evaluation team, as do the powers the At Large will have in relationship to the registry. An additional concern is that .Org Foundation, as a totally new creation of a Seattle entrepreneur, has no track record that would make us completely confident that such a commitment would be carried out. However, since they have (potentially) proposed a governance form that would give .org registrants significant representation on the Board, we have given them a High score on Input/Governance.

While the .Org Foundation was a frequent participant on the public forum, this participation was primarily in the form of posting letters of support and other self-serving statements. The bidder did respond to the NCDNHC questions and received a rating of High in the post-bid category.

The bidder proposes no relationship with the NCDNHC or a means to facilitate greater participation by noncommercial organizations within ICANN. The Committee recognizes that the bidder has recently proposed to add a validation service. Based upon the materials submitted into the record by the bidder, this validation service appears directed to external users rather than as a genuine effort to differentiate the TLD. In addition, its inclusion as an afterthought raises the suspicion that the proposal is driven by support expressed for the verification service of the DotOrg Foundation. Thus, although the Committee gave the DotOrg Foundation a “low/moderate” rating in the services category

for its service, the Committee does not award the .Org Foundation any rating for this last minute addition.

RANK 10: SWITCH

SWITCH is a non-profit organization with extensive experience in the European academic networking community. It has no other relationships with the noncommercial community. The Committee has therefore given it a “Moderate” rating in the relationship to Community category.

SWITCH has no specific plans for outreach beyond a passive website. It will create a policy council to suggest policy, with no binding force. Switch will select the first seven members of this policy council, who will then determine how to select other members. SWITCH does not detail by what criteria it will select these initial members. This method does not appear to provide any meaningful input to the broader, global noncommercial community. It has therefore received a Low rating in the Input/governance category.

SWITCH participated little in the public forum, and did not answer the questions of the NCDNHC. It therefore received a “Low” rating in this category. It has articulated no role for noncommercial within ICANN nor proposed any relationship with or support for the NCDNHC. It proposes no new services or good works.

RANK 11: ORGANIC NAMES

Organic Names maintains in its application that it is inherently impossible to be responsive to so broad a constituency as the global noncommercial user community and dangerous to try. It therefore proposes no governance structure, no formal input structure for the noncommercial community, no relationship with the NCDNHC, no mechanism for facilitating participation in ICANN by the noncommercial community, no services targeted to the noncommercial community, and no “good works” projects. The bidder does not appear to have consulted anyone about its bid, has not participated on the public forum, and did not answer the questions of the NCDNHC. It received zeros across the board.

CRITERION 6: SUMMARY OF PUBLIC SUPPORT

The RFP stated:

Demonstrated support among registrants in the .org TLD, particularly those actually using .org domain names for noncommercial purposes, will be a factor in evaluation of the proposals.

The RFP clearly means that support actually had to manifest itself in the process, either as letters of endorsements in the proposals or on the public comment board, and that the support should be as widespread as possible.

In order to facilitate a uniform comparison and ranking we put all expressions of support into two simple categories, Class A and Class B. **(See the Annex 2 on Method for additional discussion.)** Class A endorsements had to meet three criteria: 1) they had to come from an organization (as opposed to an individual), 2) the organizations had to be noncommercial, and 3) they had to be a holder of a .org domain name. The classification did not take into account differences in the size or “importance” of organizations, as that would have taken us too deeply into subjective territory or interminable measurement and verification issues. Endorsements from individuals, non-.org name holders, commercial firms, and qualified or limited endorsements were classified as Class B endorsements. Also, if a Class A endorsing organization was a financial beneficiary of the bid it was demoted to Class B.

For ranking purposes, one Class A was considered to be worth 5 Class B’s. We also rated the geographic diversity of the support expressions as “High,” “Medium,” and “Low”. Endorsements that came from individuals or businesses with a primary interest in selling domain names were discounted entirely; i.e., we interpreted the “public” in public support to mean users/consumers and not suppliers.

Table 1 below summarizes the results. The top three have demonstrated widespread support for their application and are ranked relatively high in terms of the geographic distribution of their support. The next four have demonstrated moderate support and limited or low geographic diversity. The bottom four have very limited support and low geographic diversity. Explanatory comments follow.

Table 3
Ranking by Public Support

Rank	Bidder	Class A	Class B	Score	Geo. Diversity
1	IMS/ISC	0	420	84.0	Medium
2	Unity Registry	23	39	30.8	Medium
3	Internet Society	2	100	22.0	High
4	.Org Foundation	14	17	17.4	Low
5	UIA	5	12	7.4	Medium
6	Neustar	2	24	6.8	Medium
7	DotOrg Foundation	5	5	6.0	Low
8	GNR	0	6	1.2	Low
9	RegisterOrg	0	4	0.8	Low
10	Switch	0	3	0.6	Low
11	Organic Names	0	0	0.0	--
Weight		<i>1</i>	<i>0.2</i>		

RANK 1: INTERNET MULTICASTING SERVICE/INTERNET SOFTWARE CONSORTIUM

This bidder only solicited individual endorsements. IMS/ISC received (as of August 5) 435 individualized expressions of support. We sampled and verified 120 of the messages, and based on the results feel confident classifying 420 as valid Class B endorsements. Approximately 35 percent of the supporters are estimated to be registrants of .org names. None of these messages were based on form letters and only a handful were based on direct organizational or commercial ties to the bidder; therefore, we consider it to constitute a substantial indication of independent support, although the quality and depth of the comments vary significantly. The .org name-holder endorsers of this bid consisted disproportionately of owners of personal and family websites, bloggers, and small-scale technical consultants. There were also endorsements from some well-known Internet personalities. The endorsements are nationally diverse as regards North America and European countries, but there are few from Asia, Africa, or Latin America.

RANK 2: UNITY REGISTRY

Unity Registry received the greatest number of valid support letters from noncommercial *organizations* (60+). There was a total of twenty-three (23) Class A endorsements and another thirty-nine (39) Class B endorsements. Unity was, as far as the evaluation team knows, the only bidder to consult with noncommercial organizations widely and publicly *prior* to the deadline for applications to be presented to ICANN, holding two international consultations with a wide range of civil society groups. The organizational types endorsing the Unity bid represented the broadest range of organizations, such as human rights advocates, labor union associations, community networking organizations, business associations, environmental groups, and development organizations. We think this breadth of support is important, as it reflects the diversity of the .org domain.

Geographic diversity was moderately good, with a large number of UK-based and French organizations but substantial representation from other European countries and the USA, plus a few organizations from Asia. There were few organizations from the developing world. Another key consideration is that endorsers of the Unity bid responded quickly and affirmatively to verification inquiries, indicating real support by the listed organizations.

Endorsements from dotCoop LLC and the National Business Cooperative Association were discounted because of the business relationship between these firms and PopTel, one of the operators involved in this bid. A few other organizations could not be verified.

RANK 3: THE INTERNET SOCIETY (ISOC)

The Internet Society demonstrated support for its proposal by mobilizing its own membership and chapters. With one late exception, the British Computer Society, it does not seem to have sought or received organizational endorsements from outside of ISOC. Over 500 individual indications of support for the bid, the great majority from ISOC members, were received. About 28% of them list verifiable .org registrations. These messages were obtained by having individuals fill out a web form on the ISOC site.

In assessing ISOC's support, the evaluation team found it fair and necessary to distinguish between internal and external expressions of support. Internal expressions (e.g., ISOC chapters, officers and members) were aggregated into one Class A endorsement from the Internet Society. Non-ISOC individual endorsements were counted as Class B endorsements. We estimate 100 of these, although it is not always clear which individual endorsements were ISOC members and our count may overstate the number of independent support messages.

Internal endorsements were collapsed into one Class A endorsement because many other organizations have members or member-organizations and in those cases we eliminated duplicates. Moreover, ISOC chapters, officers and members could be viewed as interested parties, because their organization might receive material benefits from ISOC's control of the .org registry. Finally, the method of demonstrating support chosen by ISOC often did not permit independent verification, as many of the names on the list have no email addresses or URLs, and the level of commitment required to post a support message is minimal. ISOC's membership endorsements are the most diverse geographically, encompassing more than 75 nations.

RANK 4: THE .ORG FOUNDATION.

The .Org Foundation received fourteen (14) Class A organizational endorsements. It also received seventeen (17) Class B individual, commercial and political organizational endorsements, only one of which had a registered .org name. The geographic scope of endorsements for this bid is extremely narrow: nearly all of the entities are based in Seattle, Washington, USA. There was political support for the bid from elected government officials in that area and the Microsoft Corporation. Nearly all of the endorsements are from the United States.

In addition, the applicant generated approximately 100 individual endorsements. These endorsements, however, were discounted by the committee because they came from commercial entities sending in form letters as a result of eNom's mobilization of its registrar marketing network. To cite one of many examples, the website of one of the supporters listed, a John Bagwell, resolves to "Bagwell Marketing Associates" and contains an advert for eNom on the front page. Although we did not have time to individually verify every one of the individual endorsements submitted by .Org Foundation, of the twenty we did sample and were able to verify, all came from commercial entities affiliated with eNom. The testimonials may indicate that eNom's customers and marketing partners are supportive, but they do not indicate "demonstrated support" for the bid "among ... those actually using .org domain names for noncommercial purposes," as required by the RFP.

RANK 5: UNION OF INTERNATIONAL ASSOCIATIONS/DIVERSITAS

The UIA bid received five (5) Class A endorsements and twelve (12) Class B endorsements. We counted the UIA itself as a Class A endorsement because it is a nonprofit holding a .org name with longstanding ties to the international community of noncommercial organizations. We did not, however, accept UIA's arguments that all of its many member organizations have indirectly endorsed its bid by using it as a directory. (See the discussion in the Appendix) The Class B organizations all lacked a .org domain name. Many of the endorsements were based on form letters.

RANK 6: NEUSTAR

The Neustar bid received two (2) Class A endorsement from the Association of Local Telecommunication Services and the American Society of Association Executives. It received Class B endorsements from twenty-four (24) organizations, nineteen (18) of which are .org name users. Some of the organizations are large associations of nonprofits. However, except for ALTS all of the messages are based on a letter that only discusses and endorses the concept of a Global Advisory Council. They do not necessarily endorse the bid as a whole or the specific bidder in relation to other bids. Twelve (12) of the letters make no mention of Neustar or explicitly disclaim any intention to support Neustar's bid over others; the others state that if Neustar is selected they will participate in the Global Advisory Council, indicating a slightly stronger level of support. But most of the organizations in the latter category did not respond to verification inquiries asking to clarify the ambiguity, and the one that did respond (Independent Sector) disassociated themselves from endorsement of the Neustar bid as such. For that reason we classified them as Class B endorsements. More than half of the letters are from organizations based in Washington, DC. Four (4) are from the UK, three (3) are from Italy, one (1) is from an organization with bases in Switzerland and Canada. The concept of a Global Advisory Council was also endorsed by country code registries in Taiwan and the Peoples Republic of China, although their status as stakeholders in the .org domain is more tenuous.

The group notes, but discounted, five endorsements received from registrar companies. As supplier organizations with a commercial interest in domain name sales, these endorsements were not relevant to the RFP's request for "demonstrated support" for the bid "among ... those actually using .org domain names for noncommercial purposes."

RANK 7: DOTORG FOUNDATION.

The DotOrg Foundation received five (5) Class A organizational endorsements and five (5) Class B endorsements. The Class A endorsements came from Association of Fundraising Professionals, Guidestar, Canada Helps, Charity Navigator and ePhilanthropy. Several of these endorsing organizations are involved in verification activities, which might give them a special interest in the DotOrg bid, but we counted them as Class A's anyway. One of the organizations, Independent Sector, has also filed comments in support of limited aspects of the Neustar bid, so we counted it as a Class B endorsement. All but two of the endorsements come from organizations based in North America.

RANK 8: GLOBAL NAME REGISTRY (GNR)

GNR received organizational endorsements from the International Federation of Red Cross and Red Crescent Societies (IFRC), the British Red Cross, and the Charities Aid Foundation. We could not classify any of these as Class A endorsements, however, because each organization has a financial interest in the success of the bid. IFRC would receive 5 percent of the revenue from the registry, the British Red Cross would act as agent of the IFRC, and the Charities Aid Foundation would be involved in allocating the funds. The GNR bid also received support letters from four (4) commercial firms supporting the idea of using .org domains for corporate social responsibility sites. Thus, in total this applicant received seven (7) Class B endorsements. We rated the geographic diversity as Low. We realize, of course, that the Red Cross is a highly internationalized organization, but there is no evidence that GNR developed relations with anyone outside of the UK.

RANK 9: REGISTERORG

The RegisterOrg bid received letters of support from four (4) organizations, all of which we classified as Class B endorsements. Two of the organizations, the Benton Foundation and the Open Society Institute, are .org name holders and noncommercial organizations. They would, however, receive financial benefits from Register.com if the bid is successful so they were not classified as Class A. All but one of the organizations are based in the USA.

RANK 10: SWITCH

The Swiss bid received supportive testimonials from three individuals. The statements came from satisfied customers of the country code registry, and were deemed independent by the review team. There was little geographic diversity as two were in Switzerland and one was in Austria. We counted them as three (3) Class B endorsements.

RANK 11: ORGANIC NAMES

The Organic Names bid produced no expressions of support in the bidding materials and received no message of support on the public bulletin board.

TWO METHODS OF SUMMARY RANKINGS

Having developed rankings across the three evaluation criteria assigned to us by ICANN, the Committee then attempted to integrate them into an overall ranking. This was done in two ways, which yield slightly different results, although in both cases the top four applicants are the same. We have deliberately retained both methods to subvert any tendency to look only at the highly simplified final rankings. We believe that only by examining rankings on all three criteria can the full picture be understood.

Method 1: Average Ranking

The first method was simply to average the rankings across all three evaluations. This method was based on the assumption that the methods and categorizations used in the different criteria cannot all be reduced to a single numerical metric, and therefore only the ranking itself should be used. Its weakness is that it does not reflect the size or strength of differences in rankings, nor does it weight the relative importance of the three Criteria. It produced the following result:

Rank	Bidder	Different	Respos	Support	Average
1.	Unity Registry	1	1	2	1.3
2.	ISOC/Afilias	5	3	3	3.7
3.	IMS/ISC	4	7	1	4.0
3.	GNR	2	2	8	4.0
5	RegisterOrg	2	6	9	5.7
6.	DotOrg	7	4	7	6.0
7.	Neustar	5	8	6	6.3
8.	UIA/Diversitas	10	5	5	6.7
9.	.Org Foundation	11	9	4	8.0
10.	SWITCH	9	10	10	9.7
11.	Organic Names	8	11	11	10.0

Mathematically, there are really four tiers in this unified ranking. Unity Registry, which placed in the first tier in all three criteria, emerges clearly as the best proposal, with an average ranking of 1.33. The second-tier applicants, the Internet Society, IMS/ISC and GNR, come in closely bunched together behind it.

Method 2: Normalized Ranking

In the second method, a normalization was applied to suppress the over-estimate influence of criteria having numerous parameters with their own weighting. This allowed us to bring all three criteria with the same capacity of influencing the results. Then, the normalized grades were added to produce the final grade.

The public support figures are taken from the table presented in Annex 2, where a stepwise approach including the geographical coverage was preferred to the straight count of received letters. The same ratio of 5 to 1 has been respected between Class A

and Class B supports, however, this method penalizes those who received zero Class A endorsements.

	Applicant	Criterion 4: Differentiation	Criterion 5: Responsiveness/ Governance	Criterion 6: Public Support	Normalized Rank
1	Unity Registry	20.50	27.25	5.00	23.80
2	ISOC/Afilias	14.50	21.25	5.00	19.80
3	GNR	16.00	26.75	1.00	15.20
4	IMS/ISC	15.00	14.00	3.00	14.73
5	Neustar	14.50	12.75	3.00	14.20
6	UIA	8.50	16.75	3.00	12.87
7	DotOrg	12.00	20.50	1.00	11.93
8	RegisterOrg	16.00	14.75	0.00	10.33
9	.Org Foundation	5.00	12.50	3.00	10.33
10	SWITCH	10.00	8.00	0.00	6.13
11	Organic Names	11.50	0.00	0.00	4.60
	weight	1.00	1.00	1.00	
	Structural weight	25.00	37.50	6.00	

The rank is deduced from the decreasing order of the grades. As for the individual criteria evaluations, the committee cast the applicants in tiers, based on the grouping of the grades.

ANNEX 1

Stuart Lynn Letter to NCDNHC

Harold and Milton have kindly (and enthusiastically) offered the NCDNHC's assistance in the evaluation of the eleven .org applications that were submitted. We greatly appreciate this offer.

In finalizing arrangements for the evaluation, we would find it very useful to receive from the NCDNHC its evaluation of each application based on criteria 4, 5, and 6 of the eleven that have been published at <http://www.icann.org/tlds/org/criteria.htm>. The published explanations of these three criteria, which are the ones most within the NCDNHC's area of special knowledge and interest, are reproduced below this message. Evaluations of the applications with respect to the other criteria will be conducted by other groups with the appropriate expertise.

It is very important that ICANN's evaluation of each application be done in a thorough and evenhanded manner, according to the published criteria, and only according to publicly posted documentation.

Accordingly, the NCDNHC's evaluation will be most useful to the overall effort if the evaluations of each application on each of the three criteria are based on a documented, reasoned analysis, and if care is taken to ensure that the evaluators hold no present or anticipated financial interest with respect to any of the applicants.

Materials that are available in connection with these three criteria include (a) the applications (posted at <http://www.icann.org/tlds/org/applications/>), particularly the responses to items C38 (criterion 4), C35 (criterion 5), and C36 (criterion 6); the presentations at the Public Forum on 26 June in Bucharest (see <http://www.icann.org/tlds/org/> for links); and the web-based public comment forum <http://forum.icann.org/org/>. We understand that the NCDNHC also received presentations by several bidders. (If these or other materials are relied on in the analysis they should be made part of the posted record--please send them to Louis Touton for that purpose.)

We are currently in the process of establishing a revised schedule for the evaluation, since it now seems clear that some delays will be necessary to do a top-quality evaluation. However, to meet the need to have the selected applicant in place for a timely transition from VeriSign we believe that any NCDNHC evaluation would be needed by approximately 15 August 2002.

Please let me know whether you believe that the NCDNHC could provide assistance as outlined above. Thanks again for your enthusiastic participation.

Best regards,

Stuart

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EVALUATION CRITERIA FOR NCDNHC ANALYSIS
(Criteria 4, 5, and 6 with explanations as posted at
<<http://www.icann.org/tlds/org/criteria.htm>>.)

4. Differentiation of the .org TLD.

A key objective is differentiation of the .org TLD from TLDs intended for commercial purposes. Appropriate marketing practices are a primary tool for achieving that objective. Proposals should include detailed planned marketing practices designed to differentiate the .org TLD, promote and attract registrations from the global noncommercial community, and minimize defensive and duplicative registrations.

5. Inclusion of mechanisms for promoting the registry's operation in a manner that is responsive to the needs, concerns, and views of the noncommercial Internet user community.

The successor operator's policies and practices should strive to be responsive to and supportive of the noncommercial Internet user community, and reflect as much of its diversity as possible. Consideration will be given to mechanisms proposed for achieving this responsiveness and supportiveness. A broad variety of mechanisms are possible, such as teaming between for-profit and non-profit organizations and establishment of governing or advisory groups for the operation of the .org registry that include representatives of the noncommercial Internet user community.

Where representative governing or advisory groups are proposed, the proposal should ensure a mechanism for providing all .org registrants with the opportunity to participate in that mechanism, either through the selection of members, or through some other means. The bylaws or other documents establishing the groups should provide explicitly for an open, transparent, and participatory process by which .org operating policies are initiated, reviewed, and revised in a manner that reflects the interests of .org domain name holders and is consistent with the terms of its registry agreement with ICANN.

6. Level of support for the proposal from .org registrants.

Demonstrated support among registrants in the .org TLD, particularly those actually using .org domain names for noncommercial purposes, will be a factor in evaluation of the proposals. Noncommercial registrants do not have uniform views about policy and management, and no single organization can fully encompass the diversity of global civil society. There will likely be significant difficulties in ascertaining the level of support for particular .org proposals from throughout the .org registrants and noncommercial community. Nevertheless, proposals to operate the .org TLD should provide available evidence of support from across the global Internet community.

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ANNEX 2

Public Support: APPENDIX ON METHOD

In assessing “public support,” endorsements were the only documented facts we had to work with. Assessing endorsements as a proxy for “the level of public support” is an inexact process. There are distinctions between individual and organizational endorsements; distinctions between organizations composed of individuals and organizations composed of other organizations; differences between individually drafted letters, form letters, and adding a name to a list; variations in organizations’ size; variations in the prominence or fame of an individual, whether the endorser is truly a noncommercial Internet user, geographic diversity, and so on.

We concluded that the best way to handle this complexity was to develop a *uniform* and *simple* method of comparing expressions of public support. A comparison based on a simple, uniform standard eliminates opportunities for discretionary judgment calls that could be influenced by biases. A purely impressionistic assessment of public support that does not bother to count, classify and analyze is not acceptable. A more complex standard of weighting endorsements might appear to be more realistic, but in fact would require information that we did not have time to get, much less verify – information that could easily be faked, as well. In the end the information and verification problems associated with more detailed methods would open the door to far more subjectivity and arbitrariness than the method we chose.

In order to facilitate a fair comparison and ranking we put all expressions of support into two crude categories:

- Class A endorsements had to meet three criteria: they had to come from organizations, the organization had to be noncommercial, and it had to hold a .org domain name. These are objective, easily verifiable criteria.
- Endorsements from individuals, non-.org name holders of any type, commercial firms, or qualified or limited expressions of support were considered to be Class B endorsements. Also, if a Class A organization was a financial beneficiary of the bid it was demoted to a Class B endorsement.
- For ranking purposes, one Class A was considered to be worth 5 Class B’s.
- We also rated the geographic diversity of the support expressions as “High,” “Medium,” and “Low” and used it as a tiebreaker.
- Endorsements that came from individuals or businesses with a primary interest in selling domain names were discounted entirely.

This method proved to be analytically useful and fairly easy to apply. Two questions about it may need to be addressed.

First, why did we not distinguish between the size of organizations? Two reasons. First, problems of measurement and double-counting would be insurmountable if we tried. There is no uniform and verifiable way to measure the “size” of organizations and it would be inappropriate to rely on self-reporting. Some organizations are members of

other organizations, leading to ridiculously large numbers and double counting. If we cannot measure objectively and accurately it is farcical to pretend to be basing our judgments on measurement.

Second, the size of an organization is not a reliable indicator of the degree of actual public support behind an endorsement of an .org proposal. It is not true that because the headquarters of a large organization endorses something that tens of thousands of their members will act in a certain way. The vast majority of members are most likely to be totally unaware of the bidding process, much less aware of the details of a particular bid; many members may have views different from the secretariat. Ultimately, all public support comes from individuals, and organizations are not perfect proxies for their individual members in this type of situation.

The gap between organizational endorsements and members is even more apparent when organizations comprised of other organizations are involved. We have a clear and compelling example of this in the .org endorsements. The International Confederation of Free Trade Unions, itself an organization composed of many organizations totaling millions of individuals, is a member of the Union of International Associations. UIA's discussion of public support initially listed ICFTU as a supporter because of its membership in UIA, but ICFTU objected because it is a major backer of Unity Registry bid. Clearly, membership in an organization does not automatically confer agency to express support. Going further down the chain, there may for all we know be individual members of ICFTU trade unions, or entire local unions for that matter, that do not favor the Unity bid. All we really know is that the organizational management of ICFTU has endorsed Unity and the management of UIA has endorsed...itself. What we were really getting in these org bids were endorsements from the secretariats of organizations, which generally means at best a small group of board members or executives and in many cases just the executive director.

Finally, in the domain name sphere, both small and large organizations may have the same number of domain name registrations under .org. In other words, in any representation or management scheme based on "one domain name, one vote" they would be weighted equally.

We do believe that organizations deserve more weight than individuals, but not that much. Which leads to a second question: Why the 5 -1 ratio?

The specific number is arbitrary, of course. It might be 4 or it might be 6. But the basic range is justified by the fact that an organizational endorsement generally involves the assent of a management group, whereas an individual endorsement involves the assent of only one person. We put the ratio on the low side based on our judgment that the management groups making the endorsement decisions were small groups. This conclusion was strengthened by our experience with the verification inquiries. Inquiries that were not directed to the specific person who signed the endorsing letter were met with incomprehension or no response. The ratio was picked prior to any ranking and applied objectively after the fact. An objective method like this, even if it is somewhat

arbitrary, at least makes transparent to decision makers the basis for the ranking. If one wishes, one can alter the 5 – 1 ratio to any other number and see how it affects the rankings.

Organizational endorsements were verified in two ways. In all cases (except for mass individual endorsements) web sites were checked to see if the organization exists, and sometimes this involved searching using Google to find the relevant URL. If we could not find the organization's site or any reference to the organization on other sites, we discounted the organization. In a sample of organizational endorsements, verification letters were sent out. The text of the email is reproduced here:

Greetings.

You or your organization submitted a support statement for one of the companies applying to take over the .org registry as part of ICANN's divestiture process.

ICANN has asked us to verify these endorsements and we would greatly appreciate it if you could respond to the following questions:

1. Please clarify whether your letter was written on behalf of your organization or represents only your personal endorsement.
2. Please affirm that no material consideration or promises of material consideration were made in exchange for your endorsement.
3. Do you consider the proposal on the whole to be superior to other proposals? (If you are unfamiliar with the other proposals please answer "Don't Know")

Thanks for your cooperation!

Dr. Milton Mueller
On behalf of the Noncommercial Domain
Name Holders Constituency
of ICANN.

Individual endorsements were so numerous that they had to be sampled rather than individually tested in total. That was only an issue with the IMS/ISC, .Org Foundation, and ISOC proposals. IMS/ISC individual endorsements were all verifiable, containing links to URLs and/or email addresses (although a few of them did not work or were duplicate, and thus were discounted.) The sample ratios were high (1 - 4) so the results should be statistically representative. Most (not all) of the .Org Foundation endorsements had email addresses or URLs associated with them, and they were sampled at a 1-4 ratio. The ISOC endorsements, which typically had no "clickable" contact information associated with them, could not be verified in this manner. That problem was solved partly by collapsing all ISOC-member endorsements into a single Class A organizational endorsement, and partly by reading through the list to come up with a rough guesstimate as to how many of the individual endorsements were not ISOC members. Our estimate tried to err on the generous side. Given the near-impossibility of verifying most of the ISOC endorsements one could argue that all of them should be discounted, but we

believe that most of them are legitimate reflections of ISOC’s standing among Internet businesses and users around the world.

Explanation of Normalization method for Public Support

The main body of the report presents the counting of support letters, which range between 0 and 84, after a ratio of 5 to 1 has been applied to the Class A vs Class B letters. The geographical diversity is not introduced, other than with a qualifier, like medium or high. To include this criterion with the same manner than the other two, a stepwise method has been used instead. To account for the 5 to 1 ratio, the scale of Class B was made five times bigger than Class A, and the geographical diversity was also converted into figures. Compared to the linear counting, this approach has a very strong flattening effect, and it gives a less significant role to the large Class B numbers, while including also the geographical coverage of the supports. The table below shows the figures for this, as they are accounted for in the normalized ranking at the end of the report.

Rank	Bidder	Class A	Grade A	Class B	Grade B	Score	Geo. Divers	Grade GD	GRADE
1	Unity Registry	23	2	39	2	30.8	Medium	1	5
2	Internet Society	2	1	100	2	22.0	High	2	5
3	IMS/ISC	0	0	420	2	84.0	Medium	1	3
4	.Org Foundation	14	2	17	1	17.4	Low	0	3
5	UIA	5	1	12	1	7.4	Medium	1	3
6	Neustar	2	1	24	1	6.8	Medium	1	3
7	DotOrg Foundation	5	1	5	0	6.0	Low	0	1
8	GNR	0	0	6	1	1.2	Low	0	1
9	RegisterOrg	0	0	4	0	0.8	Low	0	0
10	Switch	0	0	3	0	0.6	Low	0	0
11	Organic Names	0	0	0	0	0.0	--	0	0
Weight			1		1			1	3
		N > 5 ==> 2		N > 25 ==> 2			High = 2		
		0 < N ≤ 5 ==> 1		5 < N ≤ 25 ==> 1			Medium = 1		
		N = 0 ==> 0		0 < N ≤ 5 ==> 0			Low = 0		

ANNEX 3

NCDNHC evaluation committee member list

- Mr Thierry Amoussougbo, Benin
- Mr Harold Feld, USA
- Mr Eric Iriarte, Peru
- Mr Milton Mueller, USA
- Ms Youn Jung Park, Republic of Korea
- Mr Ermanno Pietrosemli, Venezuela
- Mr Marc Schneiders, Germany
- Mr Dany Vandromme, France

Annex 4 and 5

Attached as files