 Hi Dennis-

 I am writing you directly in somewhat of an 'amicus curae' manner about the
reconsideration of the HSTLD outcome.
  <http://www.icann.org/en/committees/reconsideration/reconsideration-request-
25oct10-en.pdf> http://www.icann.org/en/committees/reconsideration/reconsideration-
request-25oct10-en.pdf
<http://www.icann.org/en/committees/reconsideration/reconsideration-request-
25oct10-en.pdf>

 I do this in an individual capacity. I am not currently aligned with any applicant or
registry service provider, and I'm currently consulting part of the time with an early
stage technology start-up outside the new TLD / Registrar / Registry circus.

 I also hold the privilege of being a participant in the HSTLD Expert Working Group, in
an individual capacity.

 I wanted to add some context to the discussions as a participant of the HSTLD group.
 The group contains a humbling number of thought leaders in the area of Top Level
Domain Registries, security organizations, and trust seal providers.

 Like me, they have placed a very impressive amount of volunteer time into helping craft
something that has a very strong opportunity to grow and foster the end-user /
consumer trust and utillity in both new TLDs and in the specific TLDs that would self
elect to undergo the HSTLD certification.

 * The overall checklist that was produced by the group is a fantastic mechanism
towards ensuring protections against malicious conduct in many forms.
 * An applicant receives no benefit in the presence of a competitor for a given string in
the application process (in its current form) for electing as a HSTLD. Perhaps that
applicant even complicates their application and process and may even diminish their
attraction over another applicant in subjective review, because of possibly increased
complexity of the application in contrast to another applicant whom had not gone to the
same trouble.

 One of the things that the group had some agreement on was that the registrant and
consumer would have immense benefit from a TLD being somehow certified as one that
is a High Security TLD (HSTLD).

 Now, today, there is a seal for ICANN Accredited Registrars, an accreditation process,
agreement, a website listing these registrars (<http://internic.net> internic.net

<http://internic.net> <http://internic.net>), and even a process for requesting permission to display the ICANN Accredited Registrar logo if you are an accredited registrar.   Though still constantly improving, there is a lot that has been accomplished in the efforts in compliance, accreditation, and enforcement within the registrar space. But the key point I would like to make is that through the laudible efforts of ICANN, that "ICANN Accredited Registrar" seal plays an important role in the registrant's confidence in the overall system of registration. It positively impacts the psychology of the applicant, elevating their trust in their process of selecting from a now daunting number of registrars in a number of countries on a number of continents. That seal and the ongoing efforts of ICANN and the community to expose rougue registrars have contributed to reducing the taint and increasing the institutional trust.

 A very valuable point was raised, in the HSTLD group conference call immediately following the board vote that reconsideration is requested on, discussions that such a program of certification would best have some logo or similar 'ICANN approved' seal similar to that which registrars who are accredited enjoy.

 The process of accreditation and its ongoing administration and compliance with registrars is a process internal to ICANN, and it is staffed with capable and responsive people who do an exceptional job by my reckoning.

 Would there be the same staffing or resource requirements of registries?   In the case of an HSTLD it is not a direct translation. There are some very specific tests on the checklist that the experts group produced, many of which require particular skillsets or capabilities in order to appropriately pass or fail a given metric.   The group proposed that this type of certification process would perhaps be burdensome to ICANN but could be performed by experts through an RFI Process which could identify one or more service providers (similar to UDRP Arbitration providers).

 In any event, if there were to be one or more third party firms that were to have an ability to certify, the only real manner in which such a process would hold the same confidence and institutional trust with registrants and consumers would be through some form of seal or stamp that held ICANN's logo.

 Perhaps a healthy compromise to a lengthy reconsideration process might be to request of staff if there is a way that an HSTLD seal could be provided to passing applicants who had their HSTLD checklist certified by an approved firm. This would require some ongoing care and feeding (response to whistle blowers or annual audit status), but it would deliver something of quality that could have an impact on consumers.

 Thank you for your time and consideration.

 -Jothan

 PS: As an aside, regarding the voluntary nature of the program, I did want to nuance a particular quote which I think perhaps could lose its context as a sound bite.
 Page 3, paragraph 4 states:
    "During the consensus building efforts within the group over the past year there has

been some heated debate among the participants about the voluntary nature of this program and whether it would be hard coded into any final Applicant Guidebook."

There are a consistent minority of people within the group who keep seeking non-voluntary nature back into the discussions, and (this is the part where what he's stating is accurate) they're met with robust resistance by the majority of the other participants.

The majority view in straw polls throughout the group's existence has been consistent in reflecting that HSTLD should exist as a voluntary program. There was no consensus nor anything close to a minority consensus regarding the voluntary nature of an applicant seeking HSTLD status.

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