

## Reflecting on Community Recommendations to Improve .ORG

### .ORG NEWSROOM, PIR NEWSROOM

*By Paul Diaz, Vice President, Policy*

One of the by-products of the announced sale of Public Interest Registry (PIR) to Ethos Capital has been the robust discussion about how to improve .ORG. This has given my colleagues and me a lot to think about, and PIR welcomes the conversation. A particularly noteworthy example was the letter that the ICANN Noncommercial Stakeholders Group (NCSG) recently sent to ICANN with recommendations about .ORG. We appreciate the thought that the NCSG put into those recommendations and would like to respond.

The NCSG proposed establishing a new notification procedure regarding potential fee increases, specifically giving the community “6 months to renew their domains for periods of up to 20 years at the pre-existing annual rate.”

We believe that is an interesting idea and would give the .ORG community certainty around prices. To this end, PIR supports the ICANN community conducting policy work that could extend the maximum allowable registration term to 20 years. We’d look to ICANN to support the community’s policy work and, if consensus is reached, to change the longstanding ICANN policy that currently limits registration to 10 years uniformly across all registries. It’s also worth reminding that Ethos already has committed to limits on fee increases to no more than 10% per year, on average. Thus, the combination of price commitments and long-term registrations should give the community price certainty.

The NCSG also called for an “elimination of the URS procedure within the .ORG domain, as the rights protection mechanisms specific to the URS were appropriate only for new domains.” It’s important to note that the Uniform Rapid Suspension system was something that the ICANN community approved to be included in its base registry agreement, and, therefore, PIR and ICANN have adopted that agreement for .ORG. PIR’s other TLDs also follow the URS. If the community were to adopt a consensus policy recommendation removing the URS from the base registry agreement, PIR certainly would comply. I also note that we only have seen two URS cases in the almost six months since it was part of the .ORG agreement.

Finally, the NCSG called for a “strong commitment that the administration of the .ORG domain will remain content-neutral,” essentially mirroring the protections afforded to speech “under the U.S. First Amendment.”

We agree. PIR takes freedom of expression very seriously – we typically should not be the arbiter of website content; and our anti-abuse efforts target domain name abuse. In fact, PIR has been very transparent about **our principles regarding DNS abuse**. Year-to-date, PIR has suspended more than 36,000 .ORG domain names for technical abuse of the DNS (i.e. phishing, malware, botnets, etc.). Importantly, we only have suspended ten domain names based on their website content. Of these, eight were suspended for distribution of child sexual abuse materials (CSAM) and two were dedicated to the illegal distribution of opioids. Neither CSAM nor the illegal distribution of opioids are protected under the U.S. First Amendment.

What this review process has reinforced for PIR is that the .ORG community agrees on more than we may realize. We all have an expressed interest to keep .ORG working at the highest level for its registrants. That means it’s operational 24/7 so it’s available when the users need it. That also means that .ORG continues to be a domain extension that people trust. Further, that the .ORG community has confidence in its operations and its future, including what the fees will be. Finally, that we

continually develop new services and upgrades to keep .ORG safe and secure and beneficial to the .ORG community and the Internet as a whole.

Responding to the NCSG's recommendations are just one way we are engaging with the community. This debate about .ORG may be at times emotional and contentious but it's about .ORG's future. That's an essential and healthy debate to have. We'll continue to listen to and engage on all constructive ideas.